

10124 Old Grove Rd. San Diego California 92131-1649 (858) 586-2600 Fax (858) 586-2601 www.sdapcd.org

TITLE V OPERATING PERMIT APCD2025-TVP-00060

Issued To:

CP Kelco U.S. Inc. Site ID # APCD1976-SITE-00116

Site Address:

2025 East Harbor Drive San Diego, CA. 92113-2123

Mailing Address

2025 East Harbor Drive San Diego, CA. 92113-2123

Responsible Official – Marco Verduzco, Plant Manager Facility Contact – Edgardo Morales, Senior Environmental Manager Permit Information Contact – Edgardo Morales, Senior Environmental Manager

Issued by the San Diego County Air Pollution Control District on	
This Title V Operating Permit expires on	
Signed by:	
Mohsen Nazemi, MS, PE.	Date
Chief, Engineering Division	

San Diego County Air Pollution Control District

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PREAMBLE

This Title V Operating Permit consists of this document and all appendices, including District permits incorporated by reference. The facility is subject to all applicable requirements identified within this permit, unless a specific permit shield is specified within this permit. If an applicable requirement is omitted from this permit, the facility is still obligated to comply with such an applicable requirement. The permittee must comply with all of the terms listed in each section of this permit.

This permit contains five major sections: Section I contains the Regulation XIV requirements required to carry out the Title V Operating Permit program. Section II contains the requirements that are applicable to the facility on a facility-wide basis. Section III contains the requirements that are applicable to individual emission units which have been issued District permits or District registration, or which have been determined to be insignificant emission units. Section IV contains terms and requirements pertaining to variance procedures and compliance schedules, if applicable to the facility. Section V contains three appendices. Appendix A contains all the District permits incorporated within this permit. Appendix B contains a table of all SIP approved and District approved rules. Appendix C contains a list of abbreviations used within this permit.

Copies of the Rules and Regulations of the Air Pollution Control District of San Diego County and the Rules and Regulations for San Diego County contained in the State Implementation Plan (SIP) approved by EPA may be obtained at the District. Copies are also available for review at the following locations:

SD Air Pollution Control District 10124 Old Grove Rd San Diego, CA 92131-1649 (858) 586-2600

The current Rules and Regulations of the Air Pollution Control District of San Diego County may also be viewed and downloaded using the following internet address:

https://www.sdapcd.org/content/sdapcd/rules.html

The following addresses should be used to submit any certifications, reports or other information required by this permit:

SD Air Pollution Control District

Compliance Division

ECAD Attn: ENF 2-1

10124 Old Grove Rd

75 Hawthorne Street

San Diego, CA 92131-1649

San Francisco, CA 94105

SECTION I. REGULATION XIV PERMIT REQUIREMENTS

A. ADMINISTRATIVE PERMIT TERMS

- 1. This Title V Operating Permit expires 5 years from date of issuance. [Rule 1410]
- 2. Commencing or continuing operation under this permit to operate shall be deemed acceptance of all terms and conditions specified within this permit. This does not limit the right of the applicant to seek judicial review or seek federal EPA review of a permit term or condition. [Rule 1421]
- 3. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action. Additionally, this permit may be modified, revoked, reopened and reissued, or terminated by the District for cause. [Rule 1421(b)]
- 4. The filing of a request by the facility for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay the applicability of any permit condition. [Rule 1421(b)]
- 5. This permit does not convey any property rights of any sort, or any exclusive privilege. [Rule 1421(b)]
- 6. The need for the permittee to halt or reduce a permitted activity in order to maintain compliance with any term or condition of this permit shall not be a defense for any enforcement action brought as a result of a violation of any such term or condition. [Rule 1421(b)]
- 7. In the event of challenge to any portion of this permit, the rest of the permit remains valid. [Rule 1421(b)]
- 8. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any applicable requirement in this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [Rule 1421]

B. RENEWAL REQUIREMENTS AND TERMS

- 1. The permittee shall submit a complete application for renewal of this permit to the Air Pollution Control Officer at least 12 months, but not more than 18 months, prior to permit expiration. [Rule 1410]
- 2. If an administratively complete application for renewal of this permit has been submitted to the Air Pollution Control Officer within the timeframe specified in Section I.B.1., the terms and conditions of this permit shall remain in effect and the source may continue operations under these terms and conditions until the Air Pollution Control Officer issues or denies the permit renewal. [Rule 1410]

C. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

- 1. The permittee shall provide the District access to the facility and all equipment subject to this permit, and access to all required records pursuant to California Health and Safety Code Section 41510. [Rule 1421(b)(2)]
- 2. The permittee shall maintain all records required by this permit including any calibration, maintenance, and other supporting information and copies of all reports required by this permit for at least five (5) years from their date of creation. Such records shall be maintained on-site for a minimum of three years. This requirement controls and supersedes any other record retention requirement under this permit as it pertains to, and is required by, District Rule 1421 and Title V of the Clean Air Act. [Rule 1421(b)(1)
- 3. Records required by this permit shall be considered as being maintained "on-site" if records for the previous 12-month period are available at the stationary source and any additional records are maintained at a location to be specified by the source and made readily available to the District upon request. [Rule 21]
- 4. The permittee shall submit monitoring and recordkeeping summary reports and all other monitoring and recordkeeping reports required by this permit to the District every six months, unless a shorter time frame is required by a specific permit condition contained in Section III of this permit. Unless other dates are specified in Section III, reports for data required to be collected from January 1 through June 30, shall be submitted no later than September 1 of the calendar year, and reports for data required to be collected from July 1 through December 31, shall be submitted no later than March 1 of the following calendar year. The report for the final six months of the year may be consolidated with the annual compliance certification required below. All instances of noncompliance from federally enforceable applicable requirements shall be clearly identified in these reports. (Timely completion of District Certification Reports Form 1401-J1 and Form 1401-J2, if applicable, and all indicated attachments, fulfills the requirements of this condition.) [Rule 1421(b)(1)]
- 5. Each calendar year, the permittee shall submit to the District and to the federal EPA an annual compliance certification, in a manner and form approved in writing by the District, for the previous calendar year that includes the identification of each applicable term or condition of the final permit for which the compliance status is being certified, the compliance status and whether the facility was in continuous or intermittent compliance during the previous calendar year, identification of the method used to determine compliance during the previous calendar year, and any other information required by the District to determine the compliance status. The annual compliance certification for a calendar year shall be submitted no later than March 1 of the following calendar year and may be consolidated with the monitoring and recordkeeping report for the last six months of the year for which compliance is certified. (Timely completion of District Certification Reports Form 1401-J1 and Form 1401-J2, if applicable, and all indicated attachments, fulfills the requirements of this condition.) [Rule 1421(b)(2)]
- 6. Any report submitted to the District or federal EPA pursuant to this permit to comply with a federally enforceable applicable requirement, shall be certified by a responsible

- official stating that, based on information and belief formed after reasonable inquiry, the report is true, accurate and complete. [Rule 1421(b)(2)]
- 7. The permittee shall make any trade secret designations of records, documents, or other information submitted to the District or federal EPA in accordance with District Rule 176. [Rule 176]
- 8. The permittee shall report all deviations from any and all federally enforceable permit terms and conditions including: (a) breakdowns, whether or not they result in excess emissions, (b) deviations that result in excess emissions of any regulated air pollutant, and (c) deviations from monitoring, recordkeeping, reporting and other administrative requirements that do not result in excess emissions. For deviations that result from breakdowns under District Rule 98, the permittee shall report the deviation and breakdown within two hours of detection of the breakdown and provide a follow-up written report after corrective actions have been taken. For deviations not due to a breakdown but which result in excess emissions, the permittee shall report the deviation within ten calendar days of detection. For all other deviations where no specific time frame for reporting a deviation applies, the permittee shall report the deviation at the time of the next semi-annual monitoring summary or annual compliance certification, whichever occurs first. If an underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, then the criteria for the applicable requirement shall apply. The report must include the probable cause of such deviations and any corrective actions or preventive measures taken. [Rule 1421(b)(1)]

D. GENERAL PERMIT REQUIREMENTS

- 1. The permittee shall comply with all terms and conditions of this permit. This permit consists of this document and Appendices A, B and C. Any noncompliance with the federally applicable terms and conditions of this permit shall constitute a violation of the federal Clean Air Act. Noncompliance with any federally applicable permit term or condition of this permit is grounds for federal enforcement action or enforcement action by the District; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Noncompliance with any District permit term or condition is grounds for enforcement action by the District. [Rule 1421]
- 2. Upon a written request by the District, the permittee shall furnish to the District any information needed to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit; any information required to determine compliance with this permit; or any records required to be maintained pursuant to this permit. Such information shall be provided within a reasonable time, as specified within the District's written request. [Rule 1421]
- 3. The permittee shall pay annual fees in accordance with District Rule 40. [Rule 1421]
- 4. The permittee shall provide access, facilities, utilities and any necessary safety equipment for source testing and inspection upon request from the District. [Rule 19]
- 5. This permit shall be maintained on-site at all times and be made available to the District upon request. [Rule 1410]

6. All requirements stipulated in this permit are considered federally enforceable, except as specifically noted where individual requirements are only local/district-only enforceable. [Rule 1421]

SECTION II. FACILITY-WIDE REQUIREMENTS

A. GENERAL PERMIT PROGRAM APPLICABLE REQUIREMENTS

The permittee shall comply with the applicable requirements specified in the Rules and Regulations cited below, unless specifically exempted by the same Rule or Regulation.

Regulation	Rule	Title
	Citation	
SDCAPCD Reg. II	10(a)	Permits Required – (a) Authority to Construct
	10(b)	Permits Required – (b) Permit to Operate
SDCAPCD Reg. II	11	Exemptions
SDCAPCD Reg. II	12	Registered Equipment
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20.1 - 20.4	New Source Review (NSR)
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. II	24	Temporary Permit to Operate
SDCAPCD Reg. II	25	Appeals
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. V	98*	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control
SDCAPCD Reg. VIIII	131	Stationary Source Curtailment Plan
SDCAPCD Reg. VIIII	132	Traffic Abatement Plan

^{*}Breakdowns/variances are not recognized by EPA and cannot grant relief from federal enforcement of applicable requirements.

B. GENERAL PROHIBITORY REQUIREMENTS

The permittee shall comply with the generally applicable requirements specified in the Rules and Regulations cited below, unless specifically exempted by the same Rule or Regulation. These generally applicable requirements apply on a facility-wide basis to all permitted equipment, registered equipment, and insignificant activities. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more permitted emission units, the requirement is also included in Section III.A. of this permit.

Regulation	Rule Citation	Title
SDCAPCD Reg. II	19.2	Continuous Emission Monitoring
		Systems
SDCAPCD Reg. IV	50	Visible Emissions

SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	58	Incinerator Burning
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	66.1 Misc. Surface Coating Operations	
		Other Processes Emitting VOCs
SDCAPCD Reg. X	40 CFR 60	NSPS - General Provisions
	Subpart A	
SDCAPCD Reg. X	40 CFR 60	NSPS - Small Industrial-Commercial-
	Subpart Dc	Institutional Steam Generating Units
SDCAPCD Reg. X	40 CFR 60	NSPS - Stationary Compression Ignition
	Subpart IIII	Internal Combustion Engines
SDCAPCD Reg. X	40 CFR 60	Spark Ignition Internal Combustion
	Subpart JJJJ	Engines
SDCAPCD Reg. XI	40 CFR 61	NESHAP - Asbestos
	Subpart M	
SDCAPCD Reg. XI	40 CFR 63	NESHAP - General Provisions
	Subpart A	
SDCAPCD Reg. XI	40 CFR 63	NESHAP for Stationary Reciprocating
	Subpart ZZZZ	Internal Combustion Engines
SDCAPCD Reg. XII	1200*	Toxic Air Contaminant NSR
SDCAPCD Reg. XII	1206*	Asbestos
40 CFR Part 82	Subpart A	Production and Consumption Controls
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air
	•	Conditioners
40 CFR Part 82	Subpart F	Recycling and Emissions Reduction

^{*} Not Federally Enforceable.

C. PERMIT SHIELDS

1. No permit shields.

D. ADDITIONAL TERMS

1. Any emission unit described in this Title V operating permit as being fired on natural gas, shall only use Public Utility Commission (PUC)-quality natural gas, unless the emission unit permit specifies otherwise. [Rules 53, 62]

SECTION III. EMISSION UNIT REQUIREMENTS

A. EMISSION UNITS

Facility Emission Units (EU) are listed below and attached in Appendix A, including all terms and conditions of such permits, and comprise the emission unit portion of this Title V Operating Permit.

EU Reference	Source
APCD2009-PTO-050265	Cogeneration Unit
APCD2009-PTO-850680	Cogeneration Unit
APCD2009-PTO-850679	Cogeneration Unit
APCD2004-PTO-000480	Boiler
APCD2004-PTO-003129	Boiler
APCD2024-PTO-005043	Boiler
APCD2006-PTO-004380	Sodium Carbonate Transfer/Storage System
APCD2005-PTO-975096	Screen/Sifters
APCD2005-PTO-973096	Screen/Sifters
APCD2005-PTO-973095	Screen/Sifters
APCD2005-PTO-973094	Screen/Sifters
APCD2005-PTO-973092	Screen/Sifters
APCD2009-PTO-901285	Milling Systems/Blenders
APCD2009-PTO-000489	Milling Systems/Blenders
APCD2005-PTO-001676	Milling Systems/Blenders
APCD2019-PTO-003410	Sieve/Shaker Screen
APCD2007-PTO-001516	Bio-Polymer Manufacturing Operation
APCD2004-PTO-002185	R&D Pilot Plant #1 Continuous Processing System
APCD2004-PTO-940043	IPA Storage Tank
APCD2004-PTO-940006	Biogum Pilot Plant
APCD2005-PTO-973084	Screen/Sifters

B. REGISTERED AND LEASED EMISSION UNITS

The permittee shall comply with the source specific applicable requirements specified in the Rules and Regulations cited below for all registered emission units, unless specifically exempted by the same Rule or Regulations.

Regulation	Rule Citation	Title
SDCAPCD Reg. II	19.2	Continuous Emission Monitoring Requirements
SDCAPCD Reg. II	NSR	New Source Review
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	53	Specific Contaminants
SDCAPCD Reg. IV	54	Dust and Fumes
SDCAPCD Reg. IV	62	Sulfur Content of Fuels

C. INSIGNIFICANT EMISSION UNITS AND ACTIVITIES

The permittee shall comply with the applicable requirements specified in the District Rules and Regulations for any Insignificant Units located at this facility that are listed at District Regulation XIV, Appendix-A.

SECTION IV. DISTRICT-ONLY PROVISIONS

VARIANCE PROCEDURES

The permittee may seek relief from District enforcement action from <u>District-only provisions</u> in the event of a breakdown in accordance with District Rule 98. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance does not provide relief from federal enforcement or citizen's suits. [Rule 98]

SECTION V. APPENDICES

APPENDIX A: EMISSION UNITS – SPECIFIC CONDITIONS

EU Reference	Source
APCD2009-PTO-050265	Cogeneration Unit
APCD2009-PTO-850680	Cogeneration Unit
APCD2009-PTO-850679	Cogeneration Unit
APCD2004-PTO-000480	Boiler
APCD2004-PTO-003129	Boiler
APCD2024-PTO-005043	Boiler
APCD2006-PTO-004380	Sodium Carbonate Transfer/Storage System
APCD2005-PTO-975096	Screen/Sifters
APCD2005-PTO-973096	Screen/Sifters
APCD2005-PTO-973095	Screen/Sifters
APCD2005-PTO-973094	Screen/Sifters
APCD2005-PTO-973092	Screen/Sifters
APCD2009-PTO-901285	Milling Systems/Blenders
APCD2009-PTO-000489	Milling Systems/Blenders
APCD2005-PTO-001676	Milling Systems/Blenders
APCD2019-PTO-003410	Sieve/Shaker Screen
APCD2007-PTO-001516	Bio-Polymer Manufacturing Operation
APCD2004-PTO-002185	R&D Pilot Plant #1 Continuous Processing System
APCD2004-PTO-940043	IPA Storage Tank
APCD2004-PTO-940006	Biogum Pilot Plant
APCD2005-PTO-973084	Screen/Sifters



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PERMIT ID APCD2009-PTO-050265

Site ID: APCD1976-SITE-0116 **App ID:** APCD2018-APP-005560

CP Kelco US Inc Owner Manager 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Cogeneration Unit #1: One (1) Solar Mars 100 SoLoNOx turbine, S/N MG82615, natural gas fired, 105.76 MMbtu/hour (LHV) @ 59° F engine inlet temperature, 60% RH, 9.175 MW net power limited at the generator; with one (1) Coen low-NOx duct burner, 38 MMbtu/hour (lhv) fired on natural gas; Koch dual TFE lube oil mist control system; one Deltak type Delta 445-428e waste heat recovery boiler; and one CEMTEK continuous emission monitoring system (CEMS) with VIM Technologies CEMLink DAS data acquisition system. (940582 OWC) (950336 EAD 0597)(960257, 961209 GDS)(973018 AFS 060799)(975672 10/00) (974505 EAD 2/15/01)(982164 SJR 12/04)(982810 ALC 07/06)(chg turbine from 90S to 100 per RMA 02/08)(985946 ALC 03/09)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [92F] NOx and CO Source Test

1 [20E] Non- Aircraft Turbine Engine 1 [92J] CEMS Evaluation (T&M)

BEC: APCD2016-CON-001222

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

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A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. The measured data, formulae, constants and assumptions used to calculate the rolling aggregates for Oxides of Nitrogen (NOx) and Carbon Monoxide (CO) for a 12-month period shall be clearly documented. The data to be recorded to calculate the aggregates for NOx and CO for a 12-month period shall include:
 - -Fuel flow-rate
 - -Stack Gas NOx content
 - -Stack Gas CO content
 - -Stack Gas Oxygen content
 - -Pounds per hour NOx
 - -Pounds per hour CO

[Rule 1200, Rule 20.3]

- 2. The aggregate CO emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, and the boilers operating under Permit to Operate Nos. 480, 3129. and 5043 shall be calculated as a rolling aggregate for a 12-month period. CO emissions from the Cogen systems, as measured by the Continuous Emission Monitoring System (CEMS), and from the boilers for rolling aggregate for a 12-month period determination shall be recorded monthly within 15 days after the last day of each month. If the rolling aggregate for a 12-month period reaches a value of 75 tons or greater, the CO emissions from the Cogen systems shall be recorded daily by the CEMS and the rolling monthly annual average of aggregate CO emissions shall be maintained and checked within 15 days after the last day of each month to verify that CO emissions from the Cogen systems and boilers do not exceed 100 tons per twelve consecutive months. [Rule 20.3]
- 3. The aggregate NOx emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, the boilers operating under Permit to Operate Nos. 480, 3129, and 5043 shall not exceed 50 tons for any consecutive 365 day period as calculated according to the provisions of this permit. [Rule 20.2, 20.3]
- 4. Compliance with the aggregate NOx and CO emission limits shall be demonstrated with CEM records for the turbines combined with emission calculations for the boilers. Emissions from boilers shall be calculated for all fuels as follows: a. Tons per year NOx = fuel usage x NOx emission factor
 - b. Tons per year CO = fuel usage x CO emission factor
 - The emission factors shall be calculated based on the most recent District approved tests. Documentation to substantiate the calculations and assumptions shall be maintained and made available to the District upon request. [Rule 1200, Rule 20.3]
- 5. The aggregate NOx emissions from the Cogen Systems and Boilers shall be calculated as a 365 day rolling total. NOx emissions from the boilers shall be calculated on at least a monthly basis, and the rolling total shall be updated by the 15th day of each month to include NOx emissions from the Boilers for the previous calendar month. [Rule 20.2, 20.3]
- 6. Emissions from any contractor owned diesel engines operated at this stationary source shall be calculated annually (by March 1 of the next year) using equipment fuel consumption quantities and EPA certified emission data for the applicable engine family, or for uncertified engines, the latest applicable emission factors for the combustion equipment and fuel as listed in EPA AP-42. The owner or operator shall maintain records of fuel use, hours of operation, EPA engine family and maximum rated brake-horsepower as needed for each engine to calculate these emissions. These calculations shall be incorporated into facility-wide emission totals at least once per year and shall be fully updated no later than March 1 for the preceding calendar year. [Rule 20.3(a)]
- Excess emission reductions associated with the NOx Emission Caps defined in these conditions and the alternate BACT emission limits and compliance schedule are not eligible for banking. [Rule 1200. Rule 20.3]



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- 8. The 50 ton per year aggregate NOx BACT emission limit applies to permit numbers 050265, 850679, 850680, 000480, 003129, and 005043. This limit also applies to any future modifications to the aforementioned permits, and any equipment installed at the facility that will replace, supplant, or supplement any of the equipment covered by the aforementioned permits. The permit holder may petition the Air Pollution Control Officer to remove the alternative BACT NOx limit, provided that each of these permitted emission units is permanently destroyed, individually modified to comply with BACT requirements for its entire potential to emit, or is replaced by an emission unit that individually complies with BACT requirements. Any additional applicable requirements of rule 20.3, including but not limited to, installation of LAER and provision of offsets will apply if the limit is removed. If authority to operate any of this equipment is transferred to another party, all requirements shall remain in effect. [Rule 20.2, 20.3]
- 9. The Gas Turbine shall not operate in the Full Exhaust Bypass Mode for greater than 40 hours per calendar year excluding Gas Turbine startup and shutdown periods. Full Exhaust Bypass Mode occurs when the Gas Turbine exhaust is diverted through the Bypass Stack and the exhaust gas flow to the CEMS Stack is not sufficient to provide valid emissions readings from the CEMS. Full Exhaust Bypass will be defined as those times when average hourly Oxygen concentrations are greater than 18.0% as recorded by the CEMS. Hours meeting these criteria that result from instrument calibration events will not be considered as indications of Full Exhaust Bypass. When the Gas Turbine is not operating in the Full Exhaust Bypass Mode, exhaust flow to the Stack containing the CEMS shall be sufficient to provide valid emissions readings from the CEMS. The Permittee shall maintain records of the dates, times and Gas Turbine run hours during Full Exhaust Bypass operation and provide the records to the District upon request. [Rule 69.3.1, Rule 20.3]
- 10. The NOx emission volumetric concentration limits in these conditions, except for the NOx concentration limit required by NSPS GG, shall not apply during gas turbine engine startup or shutdowns, for a period not to exceed 120 continuous minutes. This provision does not exempt periods of startup/shutdown of the duct burners. Records in accordance with the rules 69.3 and 69.3.1 shall be maintained to justify exemption of the combustion turbine from applicable emission standards of rules 69.3 and 69.3.1.
- 11. The concentration based emission standards of this permit do not apply to up to 130 minutes of operation per calendar day, not to exceed a total of 780 minutes per calendar year during periods of operation at low load as defined in this permit. The owner or operator may exclude these exempt periods from compliance determination using CEMS data except they must still be included in any calculation of aggregate annual emissions (ton/yr) from this equipment. [Rule 69.3.1]
- 12. The concentration based emission standards of this permit do not apply to up to 130 minutes of operation per calendar day, not to exceed a total of 780 minutes per calendar year during periods of operation at low load as defined in this permit. The owner or operator may exclude these exempt periods from compliance determination using CEMS data except they must still be included in any calculation of aggregate annual emissions (ton/yr) from this equipment. [Rule 69.3.1]
- 13. For the purposes of this permit, periods of operation at low load shall be defined as a period of time where gas turbine power level is reduced from a higher level to a lower level where the turbine emissions no longer comply with the emission standards of this permit. The period ends 10 minutes after turbine power levels exceed the level where the turbine is capable of complying with the emission standards of this permit. A period of operation at low load shall not begin during either a startup or shutdown.

 [Rule 69.3.1]
- 14. The owner or operator shall maintain records documenting load levels and CEMS records of NOx emissions levels for each period of operation at low load excluded from any compliance determination. [Rule 69.3.1]
- 15. The maximum fuel rate for Natural Gas to the Duct Burner shall not exceed 38.0 million BTU/hr based on the lower heating value of the fuel. [Rule 20.3]
- 16. Non-resettable totalizing meters with an accuracy of +/- 5% shall be installed in each fuel line to measure the volumetric flow rate corrected for temperature and pressure of the fuel. Any correction factors shall be maintained on-site and made available to the District upon request.

 [Rule 69.3.1]



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17. Records of fuel usage shall be maintained and made available to the District upon request. These records shall indicate actual times and duration of all turbine startups and shutdowns.

[Rule 69.3.1 (e)]

- 18. If the total aggregate stationary source CO emissions for any rolling 12-month period exceed 75 tons, the values of 300 PPMV and 81 pounds CO per hour shall be manually entered as an addendum to the CEM emission records during times when the Carbon Monoxide (CO) concentration exceeds the analyzer range of 50 PPMV. At all times, records shall be maintained of times when this analyzer range was exceeded and emissions during these times, calculated pursuant to this condition, shall be included in any data submitted to the District for the purposes of emissions inventory or to evaluate the applicability of requirements.

 [Rule 20.3, Rule 1200, Rule 69.3.1]
- 19. Visible emissions from the lube oil vent mist eliminator serving the lube oil vent of the gas turbine shall not exceed 20% opacity for more than three (3) minutes in any period of 60 consecutive minutes.

 [Rule 50]
- 20. The District must be notified in writing at least two (2) weeks prior to any changes made in the CEM software which affects the value of data displayed on the CEM monitors with respect to the parameters measured by their respective sensing devices.

 [Rule 69.3.1, Rule 21]
- 21. The following records shall be maintained in a legible form:
 - -all measurements including adjustments, calibration checks and maintenance associated with the Continuous Emission Monitoring System and monitoring device
 - -all performance and QA testing measurements
 - -all other information required by District Rule 69.3, 69.3.1 and CFR 60

All required records shall be made available to the District upon request for at least three (3) years following the date the information was recorded.

- 22. Permittee shall certify, calibrate, maintain and operate the continuous emission monitoring system for the monitoring of Carbon Monoxide and Oxides of Nitrogen emissions (NOx) in accordance with the requirements of sections 60.7(c), 60.7 (d), and 60.13 of Title 40, Code of Federal Regulations Part 60 (40 CFR 60), performance specifications of Appendix B of 40 CFR 60, quality assurance procedures of Appendix F of 40 CFR 60, and a protocol approved by the District. For the purpose of a compliance determination based upon source testing, the NOx and CO emissions concentration shall be calculated as the average of three subtests. For the purpose of CEMS data, the averaging period to calculate NOx and CO emissions concentration shall be one clock hour.
- 23. This equipment shall be source tested for compliance at least once per permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit, unless otherwise specified in writing by the District. Testing shall be conducted in accordance with District Source Test Method 100, or the Air Resources Board (ARB) Test Method 100 as approved by EPA. If the testing will be performed by someone other than the District, a source test protocol shall be submitted to the District for written approval at least 60 days prior to source testing to ensure compliance with District emission standards for NOx and CO prior to permit renewal. Testing shall be performed with the turbine at no less than 80% of the maximum rated power as specified by the manufacturer, and firing of the duct burner at at least 80% of the permit maximum heat input. If it is demonstrated to the satisfaction of the District that either the duct burner or the turbine cannot operate at these conditions, then emissions source testing shall be performed at the highest achievable continuous power rating and/or heat input. Test reports shall include the following operational characteristics:
 - -fuel flow rate
 - -stack gas NOx content
 - -stack gas CO content
 - -stack gas oxygen content
 - -pounds per hour NOx
 - -pounds per hour CO

[Rule 69.3.1]



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- 24. When the CEM system is not recording data and the cogen system is operating, hourly NOx and CO emissions for the annual emission calculations shall be determined using the average hourly emission rates recorded by the Reference Method during the most recent District witnessed annual source test. Alternate hourly emission rates to be used shall be NOx and CO emission factors to be determined from compliance source test emissions and fuel consumption data, in terms of pounds per hour of NOx and CO, respectively for the gas turbine engine. If alternate hourly emission rates are to be used, emission calculations used to determine alternate hourly emission rates shall be reviewed and approved by the District, in writing before the alternative hourly emission rates are incorporated with CEMS emission data. [Rule 20.3, Rule 1200, Rule 69.3.1]
- 25. The concentration of NOx measured in the exhaust stack shall not exceed 28.6 PPMV, corrected to 15% Oxygen, on a dry basis. [Rule 20.3(d)(1), Rule 69.3.1]
- 26. The concentration of NOx measured in the exhaust stack shall not exceed 180 PPMV, corrected to 15% Oxygen, on a dry basis. When determining compliance with this limit based on CEMS data, the averaging period shall be one clock hour. This limit applies at all times, including during periods of startup and shutdown. [40 CFR 60.332 (Subpart GG)]
- The concentration of NOx measured in the exhaust stack shall not exceed 28.6 PPMV, corrected to 15% Oxygen, on a 28. dry basis. When determining compliance with this limit based on CEMS data, the averaging period shall be one clock hour. When determining compliance based on source testing, the averaging period shall be as specified in the corresponding test method. [Rule 20.3(d)(1), Rule 69.3.1]
- 29. The annual (calendar year) average concentration of NOx measured in the exhaust stack shall not exceed 16.8 PPMV. corrected to 15% Oxygen, on a dry basis when the gas turbine is in operation and the duct burner is in operation. [Rule 20.3(d)]
- The annual (calendar year) average concentration of NOx measured in the exhaust stack for those periods when the gas 30. turbine is operating without the duct burner, and for those periods when the gas turbine and duct burner are operating shall be calculated and reported to the District on an annual (calendar year) basis, excluding startups, shut downs, and breakdowns. This report shall include supporting CEMS data. The report for the previous calendar year shall be submitted to the Compliance Division of the District by March 1 of each year. [Rule 20.3(d)]
- Any Violation of any Emission Standard as indicated by the CEMS shall be reported to the District within 96 hours after 31. such occurrence.

[Rule 20.3, Rule 1200, Rule 69.3.1]

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- 32. Permittee shall submit Excess Emissions and Monitoring Systems Performance Reports and Summary Report Forms to the District quarterly, except when more frequent reporting is specifically required by the District on a case-by-case basis based on the determination that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each quarter. Written reports of excess emissions shall include the following information:
 - A) The magnitude of each excess emission computed in accordance with 40 CFR 60.13(H), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions.
 - B) The process operating time during the reporting period.
 - C) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of each Cogen Unit. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted.
 - D) The date and time identifying each period during which the Continuous Monitoring System was inoperative except for zero and span checks and the nature of the System repairs or adjustments.
 - E) When no excess emissions have occurred or the Continuous Monitoring System(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.
 - F) The Summary Report form shall contain the information and be in the format shown in 40 CFR 60.7 Figure 1 unless otherwise specified by the District. One Summary Report form shall be submitted for each Pollutant monitored at each Cogen Unit. An Excess Emission Report shall be submitted with the Summary Report unless otherwise specified by the District in writing.
- 32. Particulate emissions shall not exceed 0.10 grains per dry standard cubic foot of gas which is standardized to 12 percent of Carbon Dioxide by volume. (Rule 53)
- 33. The Emission unit shall be fired on Public Utility Commission (PUC) quality natural gas only. The permittee shall maintain quarterly records of sulfur content (grains/100 dscf) and higher and lower heating values (Btu/dscf) of the natural gas and provide such records to the District personnel upon request. More frequent records or equivalent documentation from the gas utility may be utilized to satisfy this condition. [Rule 62 and 40 CFR 60 Subpart GG or Subpart KKKK]
- 33. If Particulate Emissions measurements are performed, the emissions shall be measured in accordance with District Method 5.

 [40 CFR 60.45(c)]
- 34. If requested by the District or EPA, the Sulfur content of fuel shall be measured in accordance with ASTM Test Method D-3246.
 [Rule 19.2]
- 35. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 37. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 38. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Site ID: APCD1976-SITE-00116

App ID: APCD2023-APP-008000

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APCD2009-PTO-850680

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Cogeneration Unit # 2: One (1) Solar Mars 100S model T-15000S SoLoNOx turbine, natural gas fired, rated 103 milion btu/hour @ 59 degrees f, 60% rh,(LHV) based on generator limited to 9.58 MW gross power at the generator; 10.3 MW net power output, S/N TUG06-14109; with one (1) Coen low-NOx duct burner, 38 million btu/hour fired on natural gas (LHV); one gas producer, S/N 1058M; one Koch dual TFE lube oil mist eliminator system; one Deltak type Delta 445-428E waste heat recovery boiler; and one CEMTEK continuous emission monitoring system (CEMS) with VIM Technologies CEMLink DAS data acquisition system. (978684 EAD 10/13/03)(981483/LKR ALC 02/04)(982164 SJR 12/04)(984758 ALC 02/07)(985946 ALC 03/09)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [92F] NOx and CO Source Test

1 [20E] Non- Aircraft Turbine Engine

1 [92J] CEMS Evaluation (T&M)

BEC: APCD2016-CON-001193

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

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A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. The measured data, formulae, constants and assumptions used to calculate the rolling aggregates for Oxides of Nitrogen (NOx) and Carbon Monoxide (CO) for a 12-month period shall be clearly documented. The data to be recorded to calculate the aggregates for NOx and CO for a 12-month period shall include:
 - -Fuel flow-rate
 - -Stack Gas NOx content
 - -Stack Gas CO content
 - -Stack Gas Oxygen content
 - -Pounds per hour NOx
 - -Pounds per hour CO

[Rule 1200, Rule 20.3]

2. The aggregate CO emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, and the boilers operating under Permit to Operate Nos. 480, 3129. and 5043 shall be calculated as a rolling aggregate for a 12-month period. CO emissions from the Cogen systems, as measured by the Continuous Emission Monitoring System (CEMS), and from the boilers for rolling aggregate for a 12-month period determination shall be recorded monthly within 15 days after the last day of each month. If the rolling aggregate for a 12-month period reaches a value of 75 tons or greater, the CO emissions from the Cogen systems shall be recorded daily by the CEMS and the rolling monthly annual average of aggregate CO emissions shall be maintained and checked within 15 days after the last day of each month to verify that CO emissions from the Cogen systems and boilers do not exceed 100 tons per twelve consecutive months.

[Rule 20.2, Rule 20.3]

- 3. The aggregate NOx emissions from the Cogen Systems operating under Permit to Operate nos. 50265, 850679 and 850680 and the boilers operating under Permit to Operate nos. 480, 3129. and 5043 shall not exceed 50 tons for any consecutive 365 day period as calculated according to the provisions of this permit. Additionally, total aggregate NOx emissions from this stationary source shall not exceed 50 tons during any calendar year. [Cogen and Boilers: Rule 20.2 (d)(Alternate BACT), 20.3(a); Stationary Source Total: 20.3(a)].
- 4. Compliance with the aggregate NOx and CO emission limits shall be demonstrated with CEM records for the turbines combined with emission calculations for the boilers.

Emissions from boilers shall be calculated for all fuels as follows:

- a. Tons per year NOx = fuel usage x NOx emission factor
- b. Tons per year CO = fuel usage x CO emission factor

The emission factor shall be calculated based on the most recent District approved tests.

Documentation to substantiate the calculations and assumptions shall be maintained and made available to the District upon request.

[Rule 1200, Rule 20.3]

- 5. The aggregate NOx emissions from the Cogen Systems and Boilers shall be calculated as a 365 day rolling total. NOx emissions from the boilers shall be calculated on at least a monthly basis, and the rolling total shall be updated by the 15th day of each month to include NOx emissions from the Boilers for the previous calendar month. [Rule 20.2, 20.3]
- 6. Emissions from any contractor owned diesel engines operated at this stationary source shall be calculated annually (by March 1 of the next year) using equipment fuel consumption quantities and EPA certified emission data for the applicable engine family, or for uncertified engines, the latest applicable emission factors for the combustion equipment and fuel as listed in EPA AP-42. The owner or operator shall maintain records of fuel use, hours of operation, EPA engine family and maximum rated brake-horsepower as needed for each engine to calculate these emissions. These calculations shall be incorporated into facility-wide emission totals at least once per year and shall be fully updated no later than March 1 for the preceding calendar year. [Rule 20.3(a)]
- 7. Excess emission reductions associated with the NOx Emission Caps defined in these conditions and the alternate BACT emission limits and compliance schedule are not eligible for banking.
 [Rule 1200, Rule 20.3]



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- 8. The 50 ton per year aggregate NOx BACT emission limit applies to permit numbers 050265, 850679, 850680, 000480, 003129, and 005043. This limit also applies to any future modifications to the aforementioned permits, and any equipment installed at the facility that will replace, supplant, or supplement any of the equipment covered by the aforementioned permits. The permit holder may petition the Air Pollution Control Officer to remove the alternative BACT NOx limit, provided that each of these permitted emission units is permanently destroyed, individually modified to comply with BACT requirements for its entire potential to emit, or is replaced by an emission unit that individually complies with BACT requirements. Any additional applicable requirements of rule 20.3, including but not limited to, installation of LAER and provision of offsets will apply if the limit is removed. If authority to operate any of this equipment is transferred to another party, all requirements shall remain in effect. [Rule 20.2, 20.3]
- 9. The Gas Turbine shall not operate in the Full Exhaust Bypass Mode for greater than 40 hours per calendar year excluding Gas Turbine startup and shutdown periods. Full Exhaust Bypass Mode occurs when the Gas Turbine exhaust is diverted through the Bypass Stack and the exhaust gas flow to the CEMS Stack is not sufficient to provide valid emissions readings from the CEMS. Full Exhaust Bypass will be defined as those times when average hourly Oxygen concentrations are greater than 18.0% as recorded by the CEMS. Hours meeting these criteria that result from instrument calibration events will not be considered as indications of Full Exhaust Bypass. When the Gas Turbine is not operating in the Full Exhaust Bypass Mode, exhaust flow to the Stack containing the CEMS shall be sufficient to provide valid emissions readings from the CEMS. The Permittee shall maintain records of the dates, times and Gas Turbine run hours during Full Exhaust Bypass operation and provide the records to the District upon request. [Rule 69.3.1, Rule 20.3]
- 10. The NOx emission volumetric concentration limits in these conditions, except for the NOx concentration limit required by NSPS GG, shall not apply during gas turbine engine startup or shutdowns, for a period not to exceed 120 continuous minutes. This provision does not exempt periods of startup/shutdown of the duct burners. Records in accordance with the rules 69.3 and 69.3.1 shall be maintained to justify exemption of the combustion turbine from applicable emission standards of rules 69.3 and 69.3.1.
- 11. The concentration based emission standards of this permit do not apply to up to 130 minutes of operation per calendar day, not to exceed a total of 780 minutes per calendar year during periods of operation at low load as defined in this permit. The owner or operator may exclude these exempt periods from compliance determination using CEMS data except they must still be included in any calculation of aggregate annual emissions (ton/yr) from this equipment. [Rule 69.3.1]
- 12. For the purposes of this permit, periods of operation at low load shall be defined as a period of time where gas turbine power level is reduced from a higher level to a lower level where the turbine emissions no longer comply with the emission standards of this permit. The period ends 10 minutes after turbine power levels exceed the level where the turbine is capable of complying with the emission standards of this permit. A period of operation at low load shall not begin during either a startup or shutdown.

 [Rule 69.3.1]
- 13. The owner or operator shall maintain records documenting load levels and CEMS records of NOx emissions levels for each period of operation at low load excluded from any compliance determination. [Rule 69.3.1]
- 14. The maximum fuel rate for Natural Gas to the Duct Burner shall not exceed 38.0 million BTU/hr based on the lower heating value of the fuel. [Rule 20.3]
- 15. Non-resettable totalizing meters with an accuracy of +/- 5% shall be installed in each fuel line to measure the volumetric flow rate corrected for temperature and pressure of the fuel. Any correction factors shall be maintained on-site and made available to the District upon request.

 [Rule 69.3.1]
- 16. Records of fuel usage shall be maintained and made available to the District upon request. These records shall indicate actual times and duration of all turbine startups and shutdowns. [Rule 69.3.1 (e)]



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17. If the total aggregate stationary source CO emissions for any rolling 12-month period exceed 75 tons, the values of 300 PPMV and 81 pounds CO per hour shall be manually entered as an addendum to the CEM emission records during times when the Carbon Monoxide (CO) concentration exceeds the analyzer range of 50 PPMV. At all times, records shall be maintained of times when this analyzer range was exceeded and emissions during these times, calculated pursuant to this condition, shall be included in any data submitted to the District for the purposes of emissions inventory or to evaluate the applicability of requirements.

[Rule 20.3, Rule 1200, Rule 69.3.1]

- 18. Visible emissions from the lube oil vent mist eliminator serving the lube oil vent of the gas turbine shall not exceed 20% opacity for more than three (3) minutes in any period of 60 consecutive minutes.

 [Rule 50]
- 19. The District must be notified in writing at least two (2) weeks prior to any changes made in the CEM software which affects the value of data displayed on the CEM monitors with respect to the parameters measured by their respective sensing devices.

 [Rule 69.3.1, Rule 21]
- 20. The following records shall be maintained in a legible form:
 - -all measurements including adjustments, calibration checks and maintenance associated with the Continuous Emission Monitoring System and monitoring device
 - -all performance and QA testing measurements
 - -all other information required by District Rule 69.3, 69.3.1 and CFR 60
 - All required records shall be made available to the District upon request for at least three (3) years following the date the information was recorded.
- 21. Permittee shall certify, calibrate, maintain and operate the continuous emission monitoring system for the monitoring of Carbon Monoxide and Oxides of Nitrogen emissions (NOx) in accordance with the requirements of sections 60.7(c), 60.7 (d), and 60.13 of Title 40, Code of Federal Regulations Part 60 (40 CFR 60), performance specifications of Appendix B of 40 CFR 60, quality assurance procedures of Appendix F of 40 CFR 60, and a protocol approved by the District. For the purpose of a compliance determination based upon source testing, the NOx and CO emissions concentration shall be calculated as the average of three subtests. For the purpose of CEMS data, the averaging period to calculate NOx and CO emissions concentration shall be one clock hour.
- 22. This equipment shall be source tested for compliance at least once per permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit, unless otherwise specified in writing by the District. Testing shall be conducted in accordance with District Source Test Method 100, or the Air Resources Board (ARB) Test Method 100 as approved by EPA. If the testing will be performed by someone other than the District, a source test protocol shall be submitted to the District for written approval at least 60 days prior to source testing to ensure compliance with District emission standards for NOx and CO prior to permit renewal. Testing shall be performed with the turbine at no less than 80% of the maximum rated power as specified by the manufacturer, and firing of the duct burner at at least 80% of the permit maximum heat input. If it is demonstrated to the satisfaction of the District that either the duct burner or the turbine cannot operate at these conditions, then emissions source testing shall be performed at the highest achievable continuous power rating and/or heat input. Test reports shall include the following operational characteristics:
 - -fuel flow rate
 - -stack gas NOx content
 - -stack gas CO content
 - -stack gas oxygen content
 - -pounds per hour NOx
 - -pounds per hour CO

[Rule 69.3.1]



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- 23. When the CEM system is not recording data and the cogen system is operating, hourly NOx and CO emissions for the annual emission calculations shall be determined using the average hourly emission rates recorded by the Reference Method during the most recent District witnessed annual source test. Alternate hourly emission rates to be used shall be NOx and CO emission factors to be determined from compliance source test emissions and fuel consumption data, in terms of pounds per hour of NOx and CO, respectively for the gas turbine engine. If alternate hourly emission rates are to be used, emission calculations used to determine alternate hourly emission rates shall be reviewed and approved by the District, in writing before the alternative hourly emission rates are incorporated with CEMS emission data. [Rule 20.3, Rule 1200, Rule 69.3.1]
- 24. The concentration of NOx measured in the exhaust stack shall not exceed 29.5 PPMV, corrected to 15% Oxygen, on a dry basis. When determining compliance with this limit based on CEMS data, the averaging period shall be one clock hour. When determining compliance based on source testing, the averaging period shall be as specified in the corresponding test method. [Rule 20.3(d)(1), Rule 69.3.1]
- 25. The concentration of NOx measured in the exhaust stack shall not exceed 190 PPMV, corrected to 15% Oxygen, on a dry basis. When determining compliance with this limit based on CEMS data, the averaging period shall be one clock hour. This limit applies at all times, including during periods of startup and shutdown. [40 CFR 60.332 (Subpart GG)]
- 26. The annual average concentration of NOx measured in the exhaust stack shall not exceed 17.5 PPMV, corrected to 15% Oxygen, on a dry basis when the gas turbine is in operation and the duct burner is not in operation. [Rule 20.3, Rule 1200]
- 27. The annual average concentration of NOx measured in the exhaust stack shall not exceed 19.0 PPMV, corrected to 15% Oxygen on a dry basis when the gas turbine and duct burner are operating. [Rule 20.3(d)(1)]
- 28. The annual average concentration of NOx measured in the exhaust stack for those periods when the gas turbine is operating without the duct burner, and for those periods when the gas turbine and duct burner are operating shall be calculated and reported to the District on an annual basis, excluding startups, shut downs, and breakdowns. This report shall include supporting monthly CEMS data. The report for the previous year shall be submitted to the Compliance Division of the District by March 1 of each year. [Rule 69.3.1]
- 29. Gross power output from the generator shall not exceed 9.58 MW. Gross power output from the generator shall be continuously measured when the gas turbine is in operation. Gross power output from the generator and the KW output limit value shall be available for display on the same generator output display screen, and a trend of power output over the most recent 60 minutes of gas turbine operation shall be displayed and made available upon request. [Rule 20.3. Rule 1200]
- 30. The power output set-point shall be permanent and cannot be modified without prior written authority from the District. The power output limit set point for Cogen Unit 2 shall not exceed 9300 kW, as displayed on the operating screen. The owner or operator shall demonstrate once per year to District Personnel, or more frequently if requested in writing, that the turbine either cannot have the set-point modified above 9300 kW, or that the system automatically lowers the set-point to 9300 kW if set to a higher level. This demonstration test must be witnessed by the District, and a report documenting the results shall be provided to District Personnel within 30 days of conducting the test if requested in writing by the District.

 [Rule 20.3, Rule 1200]
- 31. Any Violation of any Emission Standard as indicated by the CEMS shall be reported to the District within 96 hours after such occurrence.

 [Rule 20.3, Rule 1200, Rule 69.3.1]

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- 32. Permittee shall submit Excess Emissions and Monitoring Systems Performance Reports and Summary Report Forms to the District quarterly, except when more frequent reporting is specifically required by the District on a case-by-case basis based on the determination that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each quarter. Written reports of excess emissions shall include the following information:
 - A) The magnitude of each excess emission computed in accordance with 40 CFR 60.13(H), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions.
 - B) The process operating time during the reporting period.
 - C) Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of each Cogen Unit. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted.
 - D) The date and time identifying each period during which the Continuous Monitoring System was inoperative except for zero and span checks and the nature of the System repairs or adjustments.
 - E) When no excess emissions have occurred or the Continuous Monitoring System(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.
 - F) The Summary Report form shall contain the information and be in the format shown in 40 CFR 60.7 Figure 1 unless otherwise specified by the District. One Summary Report form shall be submitted for each Pollutant monitored at each Cogen Unit. An Excess Emission Report shall be submitted with the Summary Report unless otherwise specified by the District in writing.
- 33. The Emission unit shall be fired on Public Utility Commission (PUC) quality natural gas only. The permittee shall maintain quarterly records of sulfur content (grains/100 dscf) and higher and lower heating values (Btu/dscf) of the natural gas and provide such records to the District personnel upon request. More frequent records or equivalent documentation from the gas utility may be utilized to satisfy this condition. [Rule 62 and 40 CFR 60.333 (Subpart GG)]
- 34. Particulate emissions shall not exceed 0.10 grains per dry standard cubic foot of gas which is standardized to 12 percent of Carbon Dioxide by volume. (Rule 53)
- 35. If Particulate Emissions measurements are performed, the emissions shall be measured in accordance with District Method 5.

 [40 CFR 60.45(c)]
- 36. If requested by the District or EPA, the Sulfur content of fuel shall be measured in accordance with ASTM Test Method D-3246.
 [Rule 19.2]
- 37. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 38. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 39. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Cogeneration Unit # 3: One (1) Solar Mars 100S model T-15000S SoLoNOx turbine, natural gas fired, rated 103 milion btu/hour @ 59 degrees f, 60% rh,(LHV) based on generator limited to 9.58 MW gross power at the generator; 10.3 MW net power output, S/N TBD; with one (1) Coen low-NOx duct burner, 38 million btu/hour fired on natural gas (LHV); one gas producer, S/N TBD; one Koch dual TFE lube oil mist eliminator system; one Deltak type Delta 445-428E waste heat recovery boiler; and one CEMTEK continuous emission monitoring system (CEMS) with VIM Technologies CEMLink DAS data acquisition system. (978683 EAD 10/13/03)(982164 SJR 12/04)(985946 ALC 03/09)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [49A] Non-Operational Status Equipment

1 [92J] CEMS Evaluation (T&M) 1 [92F] NOx and CO Source Test

BEC: APCD2010-CON-000132

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

4. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

1. This equipment shall not be operated at any time except where limited use of this equipment is allowed without a permit to operate under a Rule 11 exemption. This limited usage shall be subject to all other applicable prohibitory rules. All records and data necessary to substantiate this Rule 11 exemption shall be maintained on site for a minimum of three calendar years and made available to the District upon request.



Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2017-INA-000210

PERMIT ID APCD2009-PTO-850679

- 2. If the previously applicable permit to operate (prior to inactivation) required source testing, the equipment shall be source tested within 60 calendar days of permit reactivation. This source testing is required to demonstrate compliance with emission standards contained in the previously applicable permit to operate, it is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District.
- 3. The permittee shall submit an application and obtain written approval from the District prior to operating the equipment under inactive status. In the event new or additional requirements are applicable to this equipment upon reactivation, the permittee shall submit an application and additional information with corresponding fees to demonstrate how the permittee will comply with the new or additional requirements and to add corresponding permit conditions.
- 5. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 6. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1996-APP-950922

APCD2004-PTO-000480

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

BOILER 8, CLEAVER BROOKS MODEL NO DL76 SERIAL NO WC1328, 72 MM BTU/HR, FIRED WITH NATURAL GAS OR DIESEL OIL, OXYGEN TRIM CONTROLLER, BURNER CONTROL. (982164/SJR) (12/04)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [13B] Boiler/Heater

1 [92F] NOx and CO Source Test

BEC: 11863

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

1. The concentration of Oxides of Nitrogen emissions in the boiler flue exhaust, as Nitrogen Dioxide (NO2), shall not exceed a test average of 30 parts per million by volume on a dry basis (PPMV), corrected to 3% Oxygen, when burning natural gas.

[Rule 69.2, Rule 1200, Rule 20.3]

- 2. When firing liquid fuel the maximum emissions of Nitrogen Oxides shall not exceed 225 PPMV, calculated as Nitrogen Dioxide at three percent Oxygen on a dry basis.
- 3. The concentration of Carbon Monoxide (CO) emissions in the boiler flue exhaust shall not exceed a test average of 400 parts per million by volume on a dry basis (PPMV), corrected to 3% Oxygen, when burning natural gas. [Rule 69.2, Rule 1200, Rule 20.3]



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- 4. This equipment shall be fired on natural gas or liquid fuel only. Natural gas used in this equipment shall be Public Utility Commission (PUC) quality natural gas only. Liquid fuel used in this equipment shall either be California Diesel fuel or Amber Oil only. Records of the natural gas sulfur content and distillate fuel oil sulfur content certification, if applicable, shall be maintained on site and made available to District personnel upon request. [Rule 53, 62, 69.2, 40 CFR 60.42c(h)]
- 5. This boiler may be fired on diesel fuel only during emergencies, periods of natural gas curtailment, or for maintenance purposes. The total cumulative hours of operation with diesel fuel during emergencies and periods of natural gas curtailment shall not exceed 168 hours per year. The total cumulative hours of operation with diesel for maintenance purposes shall not exceed 48 hours per year. [Rule 69.2(b)(2), Rule 20.3]
- 6. The owner or operator of the equipment shall maintain the following record(s) on site: a. records of the amount of each fuel combusted during each operating day, or b. records of the amount of each fuel combusted during each calendar month or c. records of the total amount of each fuel delivered to the property during each calendar month. (NSPS subpart Dc, 40 CFR 60.48c(g))
- 7. Visible emissions from this equipment shall not exceed 20% opacity (#1 Ringelmann) for more than a total of 3 minutes in any 60 consecutive minutes. (Rule 50)
- 8. Visible emissions from this equipment shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. [40 CFR 60.43c(c)]
- 9. The equipment described above shall not cause or contribute to a public nuisance. (Rule 51)
- 10. The Flue Gas Recirculation System shall be in operation in accordance with the manufacturer's instructions when the Boiler is producing steam. The Permittee shall maintain a copy of the manufacturer's instructions on-site. [Rule 20.3]
- 11. The aggregate CO emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, and the boilers operating under Permit to Operate Nos. 480, 3129. and 5043 shall be calculated as a rolling aggregate for a 12-month period. CO emissions from the Cogen systems, as measured by the Continuous Emission Monitoring System (CEMS), and from the boilers for rolling aggregate for a 12-month period determination shall be recorded monthly within 15 days after the last day of each month. If the rolling aggregate for a 12-month period reaches a value of 75 tons or greater, the CO emissions from the Cogen systems shall be recorded daily by the CEMS and the rolling monthly annual average of aggregate CO emissions shall be maintained and checked within 15 days after the last day of each month to verify that CO emissions from the Cogen systems and boilers do not exceed 100 tons per twelve consecutive months. [Rule 20.3]
- 12. The aggregate NOx emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, the boilers operating under Permit to Operate Nos. 480, 3129, and 5043 shall not exceed 50 tons for any consecutive 365 day period as calculated according to the provisions of this permit. [Rule 20.2, 20.3]
- 13. The aggregate NOx emissions from the Cogen Systems and Boilers shall be calculated as a 365 day rolling total. NOx emissions from the boilers shall be calculated on at least a monthly basis, and the rolling total shall be updated by the 15th day of each month to include NOx emissions from the Boilers for the previous calendar month. [Rule 20.2, 20.3]
- 14. Compliance with the aggregate NOx and CO emission limits shall be demonstrated with CEM records for the turbines combined with emission calculations for the boilers.

Emissions from boilers shall be calculated for all fuels as follows:

- a. Tons per year NOx = fuel usage x NOx emission factor
- b. Tons per year CO = fuel usage x CO emission factor

The emission factor shall be calculated based on the most recent District approved tests.

Documentation to substantiate the calculations and assumptions shall be maintained and made available to the District upon request.

[Rule 1200, Rule 20.3]



COUNTY OF SAN DIEGO. AIR POLLUTION CONTROL DISTRICT **10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649**

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15. Excess emission reductions associated with the NOx emission caps defined in these conditions and the alternate BACT emission limits and compliance schedule are not eligible for banking. [Rule 1200. Rule 20.3]

- The 50 ton per year aggregate NOx BACT emission limit applies to permit numbers 050265, 850679, 850680, 000480 & 16. 003129. This limit also applies to any future modifications to the aforementioned permits, and any equipment installed at the facility that will replace, supplant, or supplement any of the equipment covered by the aforementioned permits. The permit holder may petition the Air Pollution Control Officer to remove the alternative BACT NOx limit, provided that each of these permitted emission units is permanently destroyed, individually modified to comply with BACT requirements for its entire potential to emit, or is replaced by an emission unit that individually complies with BACT requirements. Any additional applicable requirements of rule 20.3, including but not limited to, installation of LAER and provision of offsets will apply if the limit is removed. If authority to operate any of this equipment is transferred to another party, all requirements shall remain in effect. [Rule 20.2, 20.3]
- Non-resettable totaling meters with an accuracy of +/-5% shall be installed in each fuel line to measure the volumetric 17. flow rate corrected for temperature and pressure of the fuel. Any correction factors shall be maintained on site and made available to the District upon request. All records required by this permit, including fuel usages shall be maintained onsite for a minimum of three years and made available to District personnel upon request. [Rule 69.2]
- 18. This equipment shall be source tested once each permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. Each annual source test shall be separated by at least 90 days from any annual source test performed in a different permit year. [Rule 20.3, Rule 69.2(g)(4)]
- Concentrations of NOx, CO and O2 in the exhaust shall be measured in accordance with SDC APCD Test Method 100. 19. [Rule 69.2(f)(1)]
- Emissions of particulate matter from the exhaust stack of the equipment shall not exceed 0.10 grain per dry standard 20. cubic foot (0.23 grams per dry standard cubic meter) of gas. Periodic source testing is not required to determine compliance with this limit, unless requested in writing by the District based on information indicating that emissions are in excess of this limit. (Rule 52(d))
- If Particulate Emissions measurements are performed, the emissions shall be measured in accordance with District 21. Method 5. [40 CFR 60.45(c)]

The Sulfur content of fuel shall be measured in accordance with ASTM Test Method D-3246.

- 22. [Rule 19]
- Fuel supplier certification shall be maintained onsite and include the following information: 23.
 - a. Name of oil supplier
 - b. statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in § 60.41c; and
 - c. The sulfur content or maximum sulfur content of the oil.

[40 CFR Dc 60.48c(f)]

- The Owner or Operator shall submit excess emission reports for any visible emission exceedances the occurred during 24. each six-month reporting period and maintain the following records:
 - a. EPA monitoring methodology used
 - b. Dates and time intervals of all opacity observation periods;
 - c. Name, affiliation, and copy of current visible emission reading certification (if applicable) for each visible emission observer participating in the performance test;
 - d. Copies of all visible emission observer opacity field data sheets:
 - e. Documentation of any adjustments made and the time adjustments were completed (if applicable). [40 CFR Dc 60.48c (c)]



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- 25. The aggregate NOx emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, the boilers operating under Permit to Operate Nos. 480, 3129, and 5043 shall not exceed 50 tons for any consecutive 365 day period as calculated according to the provisions of this permit. [Rule 20.2, 20.3]
- Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon 26. request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 27. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 28. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)

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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2012-APP-002248

APCD2004-PTO-003129

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Boiler #9: Cleaver Brooks, model DL76, S/N WL 1459, fired with Natural Gas, 78 MMBtu/hour heat input rating; ultra low NOx burner, TODD COEN model D-RMB T1200IGX3256X, S/N 9132559; controlled by COEN FYR burner management and combustion control system including flue gas recirculation (FGR) and stack oxygen/air:fuel ratio trim system

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [13B] Boiler/Heater

1 [92F] NOx and CO Source Test

BEC: APCD2013-CON-000715

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. This equipment shall be fired on Public Utility Commission (PUC) quality natural gas only. Records of the natural gas sulfur content shall be maintained on site and made available to District personnel upon request. (Rule 53, 62, 69.2, 40 CFR 60 NSPS Dc 60.42c)
- 2. Emissions from this equipment shall not exceed the visible emissions standards of District Rule 50.
- The equipment described above shall not cause or contribute to a public nuisance. (Rule 51)
- 4. Non-resettable totaling meters with an accuracy of +/-5% shall be installed in each fuel line to measure the volumetric flow rate corrected for temperature and pressure of the fuel. Any correction factors shall be maintained on site and made available to the District upon request. All records required by this permit, including fuel usages shall be maintained onsite for a minimum of three years and made available to District personnel upon request. [Rule 69.2]



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5. The aggregate CO emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, and the boilers operating under Permit to Operate Nos. 480, 3129. and 5043 shall be calculated as a rolling aggregate for a 12-month period. CO emissions from the Cogen systems, as measured by the Continuous Emission Monitoring System (CEMS), and from the boilers for rolling aggregate for a 12-month period determination shall be recorded monthly within 15 days after the last day of each month. If the rolling aggregate for a 12-month period reaches a value of 75 tons or greater, the CO emissions from the Cogen systems shall be recorded daily by the CEMS and the rolling monthly annual average of aggregate CO emissions shall be maintained and checked within 15 days after the last day of each month to verify that CO emissions from the Cogen systems and boilers do not exceed 100 tons per twelve consecutive months.

[Rule 20.2, Rule 20.3]

- 6. The aggregate NOx emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, the boilers operating under Permit to Operate Nos. 480, 3129, and 5043 shall not exceed 50 tons for any consecutive 365 day period as calculated according to the provisions of this permit.
 [Rule 20.2, 20.3]
- 7. Compliance with the aggregate NOx and CO emission limits shall be demonstrated with CEM records for the turbines combined with emission calculations for the boilers.

Emissions from boilers shall be calculated for all fuels as follows:

- a. Tons per year NOx = fuel usage x NOx emission factor
- b. Tons per year CO = fuel usage x CO emission factor

The emission factor shall be calculated based on the most recent District approved tests.

Documentation to substantiate the calculations and assumptions shall be maintained and made available to the District upon request.

[Rule 1200, Rule 20.3]

- 8. The aggregate NOx emissions from the Cogen Systems and Boilers shall be calculated as a 365 day rolling total. NOx emissions from the boilers shall be calculated on at least a monthly basis, and the rolling total shall be updated by the 15th day of each month to include NOx emissions from the Boilers for the previous calendar month. [Rule 20.2, 20.3]
- 9. Excess emission reductions associated with the NOx Emission Caps defined in these conditions and the alternate BACT emission limits and compliance schedule are not eligible for banking. [Rule 20.2, Rule 20.3]
- 10. The 50 ton per year aggregate NOx BACT emission limit applies to permit numbers 050265, 850679, 850680, 000480 & 003129. This limit also applies to any future modifications to the aforementioned permits, and any equipment installed at the facility that will replace, supplant, or supplement any of the equipment covered by the aforementioned permits. The permit holder may petition the Air Pollution Control Officer to remove the alternative BACT NOx limit, provided that each of these permitted emission units is permanently destroyed, individually modified to comply with BACT requirements for its entire potential to emit, or is replaced by an emission unit that individually complies with BACT requirements. Any additional applicable requirements of rule 20.3, including but not limited to, installation of LAER and provision of offsets will apply if the limit is removed. If authority to operate any of this equipment is transferred to another party, all requirements shall remain in effect.

 [Rule 20.2, 20.3]
- 11. The FYR Burner Management and Combustion Control System including the flue gas recirculation, oxygen and air/fuel ratio trim systems shall be in operation in accordance with the manufacturer's instructions when the Boiler is producing steam. The Permittee shall maintain a copy of the manufacturer's instructions on-site.

 [Rule 1200, Rule 20.3]
- 12. This equipment shall be source tested once each permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. Each annual source test shall be separated by at least 90 days from any annual source test performed in a different permit year. [Rule 1421]



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- 13. If this testing will be performed by someone other than the District, a source test protocol shall be submitted to the District for written approval at least 60 days prior to source testing. (Rule 21)
- 14. Concentrations of NOx, CO and O2 in the exhaust shall be measured in accordance with SDC APCD Test Method 100. [Rule 69.2(f)(1)]
- 15. The concentration of Oxides of Nitrogen emissions in the boiler flue exhaust, as Nitrogen Dioxide (NO2), shall not exceed 9 parts per million by volume on a dry basis (PPMV), corrected to 3% Oxygen. [Rule 20.3]
- 16. The concentration of Carbon Monoxide (CO) emissions in the boiler flue exhaust shall not exceed 300 parts per million by volume on a dry basis (PPMV), corrected to 3% Oxygen, when burning natural gas. [Rule 20.3]
- 17. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 18. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 19. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Site ID: APCD1976-SITE-00116 **App ID:** APCD2023-APP-007999

PERMIT ID APCD2024-PTO-005043

CP Kelco US Inc Owner Manager 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco Edgardo Morales 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Rental Boiler:

Manufacturer: Nebraska, Model: NOS-2A/S-55,

Equipped with a low-NOx burner:

Manufacturer: TODD, Model: Variflame SV190 natural gas fired,

Maximum rated heat input: 92.1 MMBtu/hr;

controlled by an SCR system

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [13B] Boiler/Heater

1 [92Z] Miscellaneous Source Test (T&M)

1 [92I] Ammonia Source Test 1 [92R] VOC Lab Analysis

1 [92M] Mass Emissions Test (FF) 1 [92F] NOx and CO Source Test

BEC: APCD2024-CON-002168

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COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT **10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649**

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APCD1976-SITE-00116 Site ID: APCD2023-APP-007999

PERMIT ID APCD2024-PTO-005043

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- If the equipment description contained on this permit describes multiple boilers, all conditions of the permit apply to each boiler individually, except that the conditions do not apply to a specific boiler during any calendar year in which that boiler is not operated at this facility. [Rule 20.3]
- This equipment can only operate if Permits to Operate Nos. 50265, 850679, 850680, 480 or 3129 are not operating. For 2. each day that this equipment is operated, the owner or operator shall identify in the operating log which of these units is not in operation. [Rule 20.3, 1200]
- Emissions from this equipment shall not exceed the visible emissions standards of District Rule 50. 3.
- 4. The equipment described above shall not cause or contribute to a public nuisance. (Rule 51)
- 5. This equipment shall be fired on Public Utility Commission (PUC) quality natural gas only. Records of the natural gas sulfur content shall be maintained on site and made available to District personnel upon request. (Rule 53, 62, 69.2, 40 CFR 60 NSPS Dc 60.42c)
- 6. Non-resettable totaling meters with an accuracy of +/-5% shall be installed in each fuel line to measure the volumetric flow rate corrected for temperature and pressure of the fuel. Any correction factors shall be maintained on site and made available to the District upon request. All records required by this permit, including fuel usages shall be maintained onsite for a minimum of three years and made available to District personnel upon request. [Rule 69.2]
- 7. This boiler shall be equipped with monitors to measure and display the SCR catalyst temperature and reducing agent flow rate. [Rule 20.3]
- 8. The aggregate CO emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 850680, and the boilers operating under Permit to Operate Nos. 480, 3129, and 5043 shall be calculated as a rolling aggregate for a 12-month period. CO emissions from the Cogen systems, as measured by the Continuous Emission Monitoring System (CEMS), and from the boilers for rolling aggregate for a 12-month period determination shall be recorded monthly within 15 days after the last day of each month. If the rolling aggregate for a 12-month period reaches a value of 75 tons or greater, the CO emissions from the Cogen systems shall be recorded daily by the CEMS and the rolling monthly annual average of aggregate CO emissions shall be maintained and checked within 15 days after the last day of each month to verify that CO emissions from the Cogen systems and boilers do not exceed 100 tons per twelve consecutive months. [Rule 20.3, Rule 20.3]
- The aggregate NOx emissions from the Cogen systems operating under Permit to Operate Nos. 50265, 850679 and 9. 850680, the boilers operating under Permit to Operate Nos. 480, 3129, and 5043 shall not exceed 50 tons for any consecutive 365 day period as calculated according to the provisions of this permit. [Rule 20.2, 20.3]
- 10. Unless an alternative procedure is approved in writing by the District, CO and NOx emissions from this boiler shall be calculated as follows:
 - a, tons NOx = startup fuel usage x startup NOx emission factor + normal fuel usage x controlled NOx emission factor b. tons CO = (startup fuel usage + normal fuel usage) x CO emission factor
 - Startup fuel usage is fuel usage during each period of startup, normal fuel usage is fuel usage during each period not considered a startup. Controlled NOx and CO emission factors shall be calculated based on the most recent District approved tests. A startup NOx emission factor of 37.2 lb NOx/MMscf shall be used unless a different emission factor is established through source testing. Documentation to substantiate the calculations and assumptions shall be maintained and made available to the District upon request.

[Rule 20.3]

Revision Date: 10/02/2024 Page 2 of 5 Print Date: Nov 07, 2025 Version History# 1 APC050 - Ver: 1.4



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- 11. The aggregate NOx emissions from the Cogen Systems and Boilers shall be calculated as a 365 day rolling total. NOx emissions from the boilers shall be calculated on at least a monthly basis, and the rolling total shall be updated by the 15th day of each month to include NOx emissions from the Boilers for the previous calendar month. [Rule 20.2, 20.3]
- 12. Total NOx emissions, calculated as nitrogen dioxide (NO2), from this boiler shall not exceed 2.5 tons per calendar year. [Rule 1200, Rule 20.3]
- 13. Total fuel consumption in this boiler shall not exceed 791 MMscf per calendar year. [Rule 20.3]
- 14. During startup periods as defined in this permit, emissions of Oxides of Nitrogen (NOx) from this boiler shall not exceed an exhaust concentration of 30 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen. [Rule 20.3]
- 15. Emissions of Oxides of Nitrogen (NOx) from this boiler shall not exceed an exhaust concentration of 5 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen. This limit does not apply during startup periods as defined in this permit.

 [Rule 1200, Rule 20.3]
- 16. Emissions of Carbon Monoxide (CO) from this boiler shall not exceed an exhaust concentration of 50 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen.

 [Rule 20.1]
- 17. Emissions of Volatile Organic Compounds (VOC), calculated as methane, from this boiler shall not exceed an exhaust concentration of 10 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen. [Rule 1200, Rule 20.3]
- 18. Emissions of Ammonia from this boiler shall not exceed an exhaust concentration of 10 parts per million by volume (ppmv) on a dry basis corrected to 3 percent oxygen.

 [Rule 1200, Rule 20.3]
- 19. For the purposes of this permit, a startup period shall be defined as the time following a five-minute period when the boiler does not combust fuel beginning when the boiler starts combusting fuel and ending when the SCR catalyst temperature exceeds the minimum described in this permit for ammonia injection to begin. [Rule 1200, Rule 20.3]
- 20. The selective catalytic reduction system (SCR) including ammonia injection shall be in full operation at all times the boiler is combusting fuel and the SCR catalyst temperature exceeds 400 degrees Fahrenheit or the minimum temperature for ammonia injection specified by the SCR catalyst manufacturer, whichever is lower. If lower temperature is used, manufacturer information should be provided upon request. [Rule 1200, Rule 20.3]
- 21. The owner or operator shall maintain fuel and operational records as follows:
 - a. total fuel combusted in this boiler during each calendar day (MMscf).
 - b. time(s) and duration(s) of each startup period and amount of fuel combusted during startup periods for this boiler during each calendar day (MMscf). [Rule 1200, Rule 20.3]
- 22. In each calendar year that the annual capacity factor for this boiler is less than ten percent, the boiler shall be tuned at least once per year in accordance with manufacturer's specifications or with the tuning procedure outlined in District Rule 69.2(section j). The Permittee shall be responsible for all boiler tuning and costs incurred. [Rule 69.2]
- 23. The owner or operator shall maintain control system records demonstrating that the SCR system is in operation at all times it is required to be in operation by this permit.

 [Rule 1200, Rule 20.3]



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2023-APP-007999

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APCD2024-PTO-005043

- 24. Prior to initial operation of this equipment, the owner or operator shall submit to the District the detailed design specifications for the SCR system. These specifications shall include, at a minimum, the following: schematic showing design of the exhaust, ducting, catalyst housing and injection system; catalyst manufacturer, material, type and total volume; minimum and maximum temperature for ammonia injection to prevent formation of ammonium bisulfate or damage to the catalyst; if minimum ammonia injection temperature will exceed 400 degrees Fahrenheit, analysis showing that SCR system will be effective at reducing NOx emissions over the expected operating temperature profile of the boiler; type and concentration of reductant; and control system for SCR operation.

 [Rule 1200, Rule 20.3]
- 25. No later than 14 days following initial startup of a boiler at this facility, the owner or operator shall submit to the District a report detailing the setup of the SCR system including: method of controlling ammonia dosing, range of injection rate according to load or fuel input over the expected operating profile of the boiler, expected maximum startup duration, and minimum operating load to sustain the minimum ammonia injection temperature described in this permit. [Rule 1200, Rule 20.3]
- 26. This equipment shall be source tested once each permit year (annual source test) to demonstrate compliance with the emission standards contained in this permit. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. Each annual source test shall be separated by at least 90 days from any annual source test performed in a different permit year. [Rule 69.2]
- 27. The annual source test requirements in this permit do not apply to this boiler in any year when the capacity factor does not exceed ten percent, provided that a source test is conducted on the boiler within 60 days of the annual capacity factor exceeding ten percent for a given calendar year if the boiler has not been source tested in the preceding 12 months. [Rule 69.2]
- 28. If this testing will be performed by someone other than the District, a source test protocol shall be submitted to the District for written approval at least 60 days prior to source testing. (Rule 21)
- 29. A source test protocol shall be submitted to the District for review and approval at least 30 days prior to any source test. Each test performed shall comply with the following requirements unless an alternative is approved in writing by the District:
 - a. Measurement of NOx, CO and oxygen content of the exhaust gas shall be determined in accordance with San Diego APCD Test Method 100.
 - b. Measurement of VOC emissions shall be determined in accordance with EPA Test Methods 25A and/or 18. (if VOC testing is required).
 - c. Measurement of ammonia emission concentrations shall be in accordance with Bay Area Air Quality Management District ST-1B or an alternative method approved by the District.
 - d. NOx, VOC (if applicable) and CO emission concentrations shall be calculated as an average of three subtests. The averaging period to calculate emission concentrations and to determine compliance from the results of source testing shall be at least 15 minutes and not more than 60 minutes unless otherwise specified in writing by the Air Pollution Control Officer.
 - e. Source testing shall be performed under normal operating conditions. Prior to source testing, the permittee shall provide data substantiating the normal operating load for District review and approval.

[Rule 69.2]

30. Within 30 days after the completion of source testing, a final test report shall be submitted to the District for review and approval. The testing contractor shall include as part of the test report a certification that to the best of their knowledge the report is a true and accurate representation of the test conducted and the results.

[Rule 69.2]



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- 31. The boiler shall be equipped with source test ports, scaffolding, roof access or platforms at the exhaust outlet to allow for the measurement and collection of stack gas samples consistent with all approved test protocols. The ports and platforms shall be constructed in accordance with District Method 3A, Appendix Figure 2, the stack design with the location of test ports, access provisions, etc. shall be submitted prior to initial source testing.

 [69.2]
- 32. In the event that the boiler or control device described in this permit is replaced with equipment not described in the equipment description of this permit, all provisions contained in this authorization including intial source test requirements shall apply to the replacement. This requirement does not relieve the owner or operator from submitting an application for replacement and obtaining an authority to construct prior to replacement if required by District rule 10.
- 33. All records required by this permit, including annual fuel usages and tune-up documentation, shall be maintained on site for a minimum of three years and made available to District personnel upon request.

 [69.2]
- 34. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 35. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 36. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)

Revision Date: 10/02/2024 Version History# 1 Page 5 of 5

Print Date: Nov 07, 2025 APC050 - Ver: 1.4



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

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Sectors: 5, P

Site ID: APCD1976-SITE-00116

App ID: N/A

PERMIT ID
APCD2006-PTO-004380

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

AUTOMATED BULK SODIUM CARBONATE TRANSFER/STORAGE SYS, 10-TONS/HR CAP: FILTER COLLECTOR; 1 STORAGE SILOS WITH A BAGHOUSE; BBL STATION; 2 CYCLONES; 2 HOPPERS (984443 7/06)(975996/SJR)(01/03)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [23A] Receiving System

1 [23B] Storage System

BEC: 0112A

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- Air Pollution Control Equipment shall be maintained in good operating condition and shall be functioning according to
 manufacturer instructions or Standard Operating and Maintenance Practices (SOPS) at all times when the process
 equipment is in operation, except as otherwise allowed in this Permit. A copy of the most recent District-approved O&M
 Program, SOP or manufacturer instructions shall be maintained on-site and made available to the District upon request.
 (Rule 51)
- 2. All process equipment shall be maintained and operated so that there is no leakage of air contaminants to the atmosphere prior to their treatment in the Air Pollution Control System. Dry particulate matter discharged from an opening such as a hole or slit in process equipment or ducting which falls immediately to surfaces below the hole or slit and does not remain airborne shall not be considered leakage. (Rule 54, Rule 1421)
- 3. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]



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Sectors: 5, P

Site ID: APCD1976-SITE-00116

App ID: N/A

PERMIT ID
APCD2006-PTO-004380

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 4. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 5. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2000-APP-975096

PERMIT ID APCD2005-PTO-975096

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 EQUIPMENT ADDRESS
CP Kelco
Morgan Day
2025 East Harbor Dr

San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

SCREEN MANUFACTURED BY KELCO, MODEL KELCO, S/N K09744. 975096AFS25JUL2001 (975096 ALC 02/05)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: 11535

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air Pollution Control Equipment shall be maintained in good operating condition and shall be in full operation in accordance with manufacturer's instructions at all times when the process equipment is in operation. (Rule 51)
- 2. All process and emission control equipment outside the building enclosures shall be maintained and operated so that there are no visible particulate leaks to the atmosphere prior to treatment in the respective Air Pollution Control System. (Rule 1421)
- 3. The permittee shall implement a particulate matter leak inspection, maintenance and repair program for process equipment and emissions capture and control equipment inside the building enclosures and shall include all items specified in this Permit to Operate. (Rule 1421)
- 4. On each day that the equipment is operating, the Permittee shall conduct an inspection of the equipment, while in operation, for visible particulate matter leaks, including product conveyance duct systems, Rotex screes, screens, access doors, clamped surfaces, boots, magnets, blenders, feed screws, and stray dust emissions. (Rule 1421)
- 5. The Permittee shall have replacement Rotex Flex Socks or equivalent flexible connectors on-site. (Rule 1421)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2000-APP-975096

PERMIT ID APCD2005-PTO-975096

- 6. If a visible leak of particulate matter is detected from a Rotex Flex Sock (or equivalent), the component shall be repaired or replaced with in 24 hours of detection or by the end of the batch, whichever occurs first, or shall be taken out of service until full repairs can be completed. If such a leak is detected on a Saturday or Sunday operating day and the leak is not the result of a catastrophic failure of the component and is not the source of particulate emissions that are readily visible and exceed 10 percent opacity, full repairs may be delayed until the following Monday. (Rule 1421)
- 7. If a leak is detected from other components or emission points and if a permanent or temporary repair cannot be completed by the sooner of the completion of the current production batch, or within 24 hours of detection, whichever occurs first, repairs shall be made as soon as is feasible but not later then 72 hours after detection or the equipment shall be taken out of service. (Rule 1421)
- 8. Fugitive emissions at material transfer points that are not captured by hoods, shrouds, scoops and/or tarpaulins and around equipment shaft seals shall not be considered particulate matter leaks for the purposes of this Permit to Operate provided that such emissions are minimized to the extent practicable, are not in Violation of Rule 50, and are not the result of damaged equipment. (Rule 1421)
- 9. The Permittee shall maintain daily records of inspection required herein. Such records shall include the date of each inspection, the name of the person conducting the inspection, the time and date any visible particulate matter leak is detected, and the time and date that such leak was repaired. Separate records of repairs may be maintained provided they are readily available for district inspection. Non-operating days for the plant shall be recorded as such. The person conducting the inspection shall initial the inspection record on a daily basis after each inspection has been made and the required information recorded. A 3% data loss allowance, determined on a calendar year basis and by comparing inspection day records with total operating days, shall apply to these inspection records. (Rule 1421)
- 10. All records required by this Permit to Operate shall be maintained on-site for a period not less than three years and shall be made readily available for District inspection upon request. (Rule 1421)
- 11. An unrecorded leak shall be considered a Violation of this Permit to Operate except that a single, unrecorded leak in a gravity feed system component found by the District shall not be a Violation if the component was inspected by the Permittee during the current or preceding operating day and no leak was present during that previous inspection and a record of the inspection and inspection results is available. (Rule 1421)
- 12. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 13. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 14. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973096

APCD2005-PTO-973096

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Enviromental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

SIFTER, KELCO NO. 09493973096AFS02SEP1999 (980200 10/03) (980627 ALC 02/05)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: 11535

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air Pollution Control Equipment shall be maintained in good operating condition and shall be in full operation in accordance with manufacturer's instructions at all times when the process equipment is in operation. (Rule 51)
- 2. All process and emission control equipment outside the building enclosures shall be maintained and operated so that there are no visible particulate leaks to the atmosphere prior to treatment in the respective Air Pollution Control System. (Rule 1421)
- 3. The permittee shall implement a particulate matter leak inspection, maintenance and repair program for process equipment and emissions capture and control equipment inside the building enclosures and shall include all items specified in this Permit to Operate. (Rule 1421)
- 4. On each day that the equipment is operating, the Permittee shall conduct an inspection of the equipment, while in operation, for visible particulate matter leaks, including product conveyance duct systems, Rotex screes, screens, access doors, clamped surfaces, boots, magnets, blenders, feed screws, and stray dust emissions. (Rule 1421)
- 5. The Permittee shall have replacement Rotex Flex Socks or equivalent flexible connectors on-site. (Rule 1421)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973096

PERMIT ID
APCD2005-PTO-973096

- 6. If a visible leak of particulate matter is detected from a Rotex Flex Sock (or equivalent), the component shall be repaired or replaced with in 24 hours of detection or by the end of the batch, whichever occurs first, or shall be taken out of service until full repairs can be completed. If such a leak is detected on a Saturday or Sunday operating day and the leak is not the result of a catastrophic failure of the component and is not the source of particulate emissions that are readily visible and exceed 10 percent opacity, full repairs may be delayed until the following Monday. (Rule 1421)
- 7. If a leak is detected from other components or emission points and if a permanent or temporary repair cannot be completed by the sooner of the completion of the current production batch, or within 24 hours of detection, whichever occurs first, repairs shall be made as soon as is feasible but not later then 72 hours after detection or the equipment shall be taken out of service. (Rule 1421)
- 8. Fugitive emissions at material transfer points that are not captured by hoods, shrouds, scoops and/or tarpaulins and around equipment shaft seals shall not be considered particulate matter leaks for the purposes of this Permit to Operate provided that such emissions are minimized to the extent practicable, are not in Violation of Rule 50, and are not the result of damaged equipment. (Rule 1421)
- 9. The permittee shall maintain daily records of inspection required herein. Such records shall include the date of each inspection, the name of the person conducting the inspection, the time and date any visible particulate matter leak is detected, and the time and date that such leak was repaired. Separate records of repairs may be maintained provided they are readily available for district inspection. Non-operating days for the plant shall be recorded as such. The person conducting the inspection shall initial the inspection record on a daily basis after each inspection has been made and the required information recorded. A 3% data loss allowance, determined on a calendar year basis and by comparing inspection day records with total operating days, shall apply to these inspection records. (Rule 1421)
- 10. All records required by this Permit to Operate shall be maintained on-site for a period not less than three years and shall be made readily available for District inspection upon request. (Rule 1421)
- 11. An unrecorded leak shall be considered a Violation of this Permit to Operate except that a single, unrecorded leak in a gravity feed system component found by the District shall not be a Violation if the component was inspected by the Permittee during the current or preceding operating day and no leak was present during that previous inspection and a record of the inspection and inspection results is available. (Rule 1421)
- 12. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 13. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 14. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973095

APCD2005-PTO-973095

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

SIFTER, KELCO S/N K05986. 973095AFS17AUG1999 975672 (10/00)(973095 ALC 02/05)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: 11535

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air Pollution Control Equipment shall be maintained in good operating condition and shall be in full operation in accordance with manufacturer's instructions at all times when the process equipment is in operation. (Rule 51)
- 2. All process and emission control equipment outside the building enclosures shall be maintained and operated so that there are no visible particulate leaks to the atmosphere prior to treatment in the respective Air Pollution Control System. (Rule 1421)
- 3. The permittee shall implement a particulate matter leak inspection, maintenance and repair program for process equipment and emissions capture and control equipment inside the building enclosures and shall include all items specified in this Permit to Operate. (Rule 1421)
- 4. On each day that the equipment is operating, the Permittee shall conduct an inspection of the equipment, while in operation, for visible particulate matter leaks, including product conveyance duct systems, Rotex screes, screens, access doors, clamped surfaces, boots, magnets, blenders, feed screws, and stray dust emissions. (Rule 1421)
- 5. The permittee shall have replacement Rotex Flex Socks or equivalent flexible connectors on-site. (Rule 1421)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973095

PERMIT ID
APCD2005-PTO-973095

- 6. If a visible leak of particulate matter is detected from a Rotex Flex Sock (or equivalent), the component shall be repaired or replaced with in 24 hours of detection or by the end of the batch, whichever occurs first, or shall be taken out of service until full repairs can be completed. If such a leak is detected on a Saturday or Sunday operating day and the leak is not the result of a catastrophic failure of the component and is not the source of particulate emissions that are readily visible and exceed 10 percent opacity, full repairs may be delayed until the following Monday. (Rule 1421)
- 7. If a leak is detected from other components or emission points and if a permanent or temporary repair cannot be completed by the sooner of the completion of the current production batch, or within 24 hours of detection, whichever occurs first, repairs shall be made as soon as is feasible but not later then 72 hours after detection or the equipment shall be taken out of service. (Rule 1421)
- 8. Fugitive emissions at material transfer points that are not captured by hoods, shrouds, scoops and/or tarpaulins and around equipment shaft seals shall not be considered particulate matter leaks for the purposes of this Permit to Operate provided that such emissions are minimized to the extent practicable, are not in Violation of Rule 50, and are not the result of damaged equipment. (Rule 1421)
- 9. The permittee shall maintain daily records of inspection required herein. Such records shall include the date of each inspection, the name of the person conducting the inspection, the time and date any visible particulate matter leak is detected, and the time and date that such leak was repaired. Separate records of repairs may be maintained provided they are readily available for district inspection. Non-operating days for the plant shall be recorded as such. The person conducting the inspection shall initial the inspection record on a daily basis after each inspection has been made and the required information recorded. A 3% data loss allowance, determined on a calendar year basis and by comparing inspection day records with total operating days, shall apply to these inspection records. (Rule 1421)
- 10. All records required by this Permit to Operate shall be maintained on-site for a period not less than three years and shall be made readily available for District inspection upon request. (Rule 1421)
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- 12. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 13. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 14. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973094

PERMIT ID
APCD2005-PTO-973094

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

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EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

SIFTER, KELCO S/N K04265. 973094AFS17AUG1999 975672 (10/00)(980627 ALC 02/05)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: 11535

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air Pollution Control Equipment shall be maintained in good operating condition and shall be in full operation in accordance with manufacturer's instructions at all times when the process equipment is in operation. (Rule 51)
- 2. All process and emission control equipment outside the building enclosures shall be maintained and operated so that there are no visible particulate leaks to the atmosphere prior to treatment in the respective Air Pollution Control System. (Rule 1421)
- 3. The permittee shall implement a particulate matter leak inspection, maintenance and repair program for process equipment and emissions capture and control equipment inside the building enclosures and shall include all items specified in this Permit to Operate. (Rule 1421)
- 4. On each day that the equipment is operating, the permittee shall conduct an inspection of the equipment, while in operation, for visible particulate matter leaks, including product conveyance duct systems, Rotex screens, screens, access doors, clamped surfaces, boots, magnets, blenders, feed screws, and stray dust emissions. (Rule 1421)
- 5. The permittee shall have replacement Rotex Flex Socks or equivalent flexible connectors on-site. (Rule 1421)



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT **10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649**

PHONE (858) 586-2600 Fax (858) 586-2601 www.sdapcd.org

Sectors: 5, P

App ID:

APCD1976-SITE-00116 Site ID: APCD1999-APP-973094

PERMIT ID APCD2005-PTO-973094

- 6. If a visible leak of particulate matter is detected from a Rotex Flex Sock (or equivalent), the component shall be repaired or replaced with in 24 hours of detection or by the end of the batch, whichever occurs first, or shall be taken out of service until full repairs can be completed. If such a leak is detected on a Saturday or Sunday operating day and the leak is not the result of a catastrophic failure of the component and is not the source of particulate emissions that are readily visible and exceed 10 percent opacity, full repairs may be delayed until the following Monday. (Rule 1421)
- 7. If a leak is detected from other components or emission points and if a permanent or temporary repair cannot be completed by the sooner of the completion of the current production batch, or within 24 hours of detection, whichever occurs first, repairs shall be made as soon as is feasible but not later then 72 hours after detection or the equipment shall be taken out of service. (Rule 1421)
- Fugitive emissions at material transfer points that are not captured by hoods, shrouds, scoops and/or tarpaulins and 8. around equipment shaft seals shall not be considered particulate matter leaks for the purposes of this Permit to Operate provided that such emissions are minimized to the extent practicable, are not in Violation of Rule 50, and are not the result of damaged equipment. (Rule 1421)
- The permittee shall maintain daily records of inspection required herein. Such records shall include the date of each 9. inspection, the name of the person conducting the inspection, the time and date any visible particulate matter leak is detected, and the time and date that such leak was repaired. Separate records of repairs may be maintained provided they are readily available for district inspection. Non-operating days for the plant shall be recorded as such. The person conducting the inspection shall initial the inspection record on a daily basis after each inspection has been made and the required information recorded. A 3% data loss allowance, determined on a calendar year basis and by comparing inspection day records with total operating days, shall apply to these inspection records. (Rule 1421)
- All records required by this Permit to Operate shall be maintained on-site for a period not less than three years and shall 10. be made readily available for District inspection upon request. (Rule 1421)
- An unrecorded leak shall be considered a Violation of this Permit to Operate except that a single, unrecorded leak in a 11. gravity feed system component found by the District shall not be a Violation if the component was inspected by the Permittee during the current or preceding operating day and no leak was present during that previous inspection and a record of the inspection and inspection results is available. (Rule 1421)
- 12. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 13. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 14. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)

Print Date: Oct 22, 2025 Revision Date: 07/18/2011 Page 2 of 2 Version History# 3 APC050 - Ver: 1.4



PHONE (858) 586-2600 Fax (858) 586-260 www.sdapcd.org

Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973092

APCD2005-PTO-973092

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

SCREEN, KELCO S/N K08969. 973092AFS17AUG1999 973092 (10/00)(980627 ALC 02/05)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: 11535

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air Pollution Control Equipment shall be maintained in good operating condition and shall be in full operation in accordance with manufacturer's instructions at all times when the process equipment is in operation. (Rule 51)
- 2. All process and emission control equipment outside the building enclosures shall be maintained and operated so that there are no visible particulate leaks to the atmosphere prior to treatment in the respective Air Pollution Control System. (Rule 1421)
- 3. The permittee shall implement a particulate matter leak inspection, maintenance and repair program for process equipment and emissions capture and control equipment inside the building enclosures and shall include all items specified in this Permit to Operate. (Rule 1421)
- 4. On each day that the equipment is operating, the permittee shall conduct an inspection of the equipment, while in operation, for visible particulate matter leaks, including product conveyance duct systems, Rotex screens, screens, access doors, clamped surfaces, boots, magnets, blenders, feed screws, and stray dust emissions. (Rule 1421)
- 5. The permittee shall have replacement Rotex Flex Socks or equivalent flexible connectors on-site. (Rule 1421)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973092

PERMIT ID
APCD2005-PTO-973092

- 6. If a visible leak of particulate matter is detected from a Rotex Flex Sock (or equivalent), the component shall be repaired or replaced with in 24 hours of detection or by the end of the batch, whichever occurs first, or shall be taken out of service until full repairs can be completed. If such a leak is detected on a Saturday or Sunday operating day and the leak is not the result of a catastrophic failure of the component and is not the source of particulate emissions that are readily visible and exceed 10 percent opacity, full repairs may be delayed until the following Monday. (Rule 1421)
- 7. If a leak is detected from other components or emission points and if a permanent or temporary repair cannot be completed by the sooner of the completion of the current production batch, or within 24 hours of detection, whichever occurs first, repairs shall be made as soon as is feasible but not later then 72 hours after detection or the equipment shall be taken out of service. (Rule 1421)
- 8. Fugitive emissions at material transfer points that are not captured by hoods, shrouds, scoops and/or tarpaulins and around equipment shaft seals shall not be considered particulate matter leaks for the purposes of this Permit to Operate provided that such emissions are minimized to the extent practicable, are not in Violation of Rule 50, and are not the result of damaged equipment. (Rule 1421)
- 9. The permittee shall maintain daily records of inspection required herein. Such records shall include the date of each inspection, the name of the person conducting the inspection, the time and date any visible particulate matter leak is detected, and the time and date that such leak was repaired. Separate records of repairs may be maintained provided they are readily available for district inspection. Non-operating days for the plant shall be recorded as such. The person conducting the inspection shall initial the inspection record on a daily basis after each inspection has been made and the required information recorded. A 3% data loss allowance, determined on a calendar year basis and by comparing inspection day records with total operating days, shall apply to these inspection records. (Rule 1421)
- 10. All records required by this Permit to Operate shall be maintained on-site for a period not less than three years and shall be made readily available for District inspection upon request. (Rule 1421)
- 11. An unrecorded leak shall be considered a Violation of this Permit to Operate except that a single, unrecorded leak in a gravity feed system component found by the District shall not be a Violation if the component was inspected by the Permittee during the current or preceding operating day and no leak was present during that previous inspection and a record of the inspection and inspection results is available. (Rule 1421)
- 12. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 13. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 14. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

PHONE (858) 586-2600 Fax (858) 586-2601 www.sdapcd.org

Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1991-APP-901285

APCD2009-PTO-901285

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Milling system, 330 lbs/hr cap: three (3) feed cyclones, two (2) SWECO screens two (2) model 3TH Mikropul Micromills; one (1) ribbon blender, one (1) enclosed mill, one (1) enclosed mill; two (2) baghouses; two (2) stray dust baghouses, one (1) shared with blending and packing station and one (1) shared with main vacuum system. Blending and packing station: three (3) rotary blenders Nos. 1, 2 and 3 with 100 cf, 200 cf and 200 cf capacity respectively; two (2) portable barrel hoists; one (1) stray dust baghouse shared with milling system; one bulk bag discharge vented to existing baghouse (bh2) located in Building J-10. (985550 EFH 987403 EFH)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 2 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

3 [22D] Mixer System

BEC: 0423I

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air Pollution Control Equipment shall be maintained in good operating condition and shall be functioning according to manufacturer instructions or Standard Operating and Maintenance Practices (SOPS) at all times when the process equipment is in operation, except as otherwise allowed in this Permit. A copy of the most recent District-approved O&M Program, SOP or manufacturer instructions shall be maintained on-site and made available to the District upon request. (Rule 51)
- 2. All process equipment shall be maintained and operated so that there is no leakage of air contaminants to the atmosphere prior to their treatment in the Air Pollution Control System. Dry particulate matter discharged from an opening such as a hole or slit in process equipment or ducting which falls immediately to surfaces below the hole or slit and does not remain airborne shall not be considered leakage. (Rule 54, Rule 1421)



Sectors: 5, P PERMIT ID

 Site ID:
 APCD1976-SITE-00116
 APCD2009-PTO-901285

 App ID:
 APCD1991-APP-901285

3. The Stray Dust Baghouse shall be inspected once per calendar year within 90 days prior to the Permit expiration date and cleaned and repaired as necessary. The date that equipment is inspected, cleaned or repaired shall be recorded in an Inspection/Maintenance Record which shall be made available to the District upon request. The Baghouse shall be equipped with a pressure differential gauge installed in a manner so as to be easily read by the Operator or an Inspector. The gauge pressure shall be maintained between 0.25 to 8.0 in WC. The gauge lines shall be inspected for functionality at least once per calendar year within 90 days prior to the Permit expiration date. (Rule 1421)

4. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 5. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 6. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1997-APP-961743

APCD2009-PTO-000489

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

BLDG. S-8, ONE 300 CU.FT. STAINLESS STEEL RIBBON BLENDER #13 (4000 LBS PER HOUR CAPACITY) MANUALLY LOADED WITH STRAY DUST HOOD AND DUCTING TO STRAY DUST BAGHOUSE SHARED WITH BLENDERS #10, #11, AND #12. BLENDER/PACKING SYSTEMS 250-LBS/HR CAP: THREE (3) BLENDERS; MAIN VACUUM SYSTEM, STRAY DUST BAGHOUSE. 985552 EFH

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

3 [22D] Mixer System

BEC: 13448

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- Air Pollution Control Equipment shall be maintained in good operating condition and shall be functioning according to manufacturer instructions or Standard Operating and Maintenance Practices (SOPS) at all times when the process equipment is in operation, except as otherwise allowed in this Permit. A copy of the most recent District-approved O&M Program, SOP or manufacturer instructions shall be maintained on-site and made available to the District upon request. (Rule 51)
- 2. All process equipment shall be maintained and operated so that there is no leakage of air contaminants to the atmosphere prior to their treatment in the Air Pollution Control System. Dry particulate matter discharged from an opening such as a hole or slit in process equipment or ducting which falls immediately to surfaces below the hole or slit and does not remain airborne shall not be considered leakage. (Rule 54, Rule 1421)
- 3. All transfer points between the blender and the blender loading points shall be enclosed or hooded and vented to the baghouse. (Rule 20.3)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1997-APP-961743

PERMIT ID
APCD2009-PTO-000489

4. All transfer points between the blender and the blender discharge points shall be enclosed or collared and vented to the bag-house. (Rule 20.3)

- 5. The Stray Dust Baghouse shall be inspected once per calendar year within 90 days prior to the Permit expiration date and cleaned and repaired as necessary. The date that equipment is inspected, cleaned or repaired shall be recorded in an Inspection/Maintenance Record which shall be made available to the District upon request. The Baghouse shall be equipped with a pressure differential gauge installed in a manner so as to be easily read by the Operator or an Inspector. The gauge pressure shall be maintained between 0.25 to 8.0 in WC. The gauge lines shall be inspected for functionality at least once per calendar year within 90 days prior to the Permit expiration date. (Rule 1421)
- 6. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 7. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 8. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

PHONE (858) 586-2600 Fax (858) 586-2601 www.sdapcd.org

Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2021-APP-006710

PERMIT ID APCD2005-PTO-001676

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 EQUIPMENT ADDRESS
CP Kelco US Inc

Enviromental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Dry side equipment consisting of the following:

Four mill with feed hoppers; four milling cyclones; four fine cyclones; four Rotex screens; one blender feed screw conveyor; three ribbon blenders; one ribbon blender screw conveyor; five conical blenders; one centrifugal sifter; four mill baghouses (line 1, line 2, line 3, and line 4 baghouses) and fans; one transfer (vacuum receiver) baghouse and fan; one portable bagging station for blender no. 5; three receiving hoppers with fixed screens and baggers, Sweco, Model LX 48S156; and three conveyors; one mass flow hopper for bag and barrel station; one stray dust collection system, including mill room central vacuum system; three stray dust baghouses (a, b, and c) and fans; and one perlite system.

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22D] Mixer System

4 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: APCD2023-CON-002049

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air pollution control equipment shall be maintained in good operating condition and shall be functioning according to manufacturer's instructions or standard operating and maintenance practices (SOP) at all times when the process equipment is in operation, except as otherwise allowed in this permit. (Rule 51)
- 2. The throughput of material through Line No. 4 Mill and associated screen shall not exceed 15,000 lbs per day. (Rule 20.3)
- 3. The Permittee shall maintain on the premises a record of throughput of the Line No.4 mill and associated screen on a monthly basis when the equipment is in operation and make these records available to the District upon request. (Rule 20.3)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2021-APP-006710

PERMIT ID APCD2005-PTO-001676

- 4. All process and emission control equipment outside the building enclosures shall be maintained and operated so that there are no visible particulate leaks to the atmosphere prior to treatment in the respective Air Pollution Control System. (Rule 1421)
- 5. The Permittee shall implement a particulate matter leak inspection, maintenance and repair program for process equipment and emissions capture and control equipment inside the building enclosures and shall include all items specified in this Permit to Operate. (Rule 1421)
- 6. On each day that the equipment is operating, the Permittee shall conduct an inspection of the equipment, while in operation, for visible particulate matter leaks, including product conveyance duct systems, Rotex screes, screens, access doors, clamped surfaces, boots, magnets, blenders, feed screws, and stray dust emissions. (Rule 1421)
- 7. The Permittee shall have replacement Rotex Flex Socks or equivalent flexible connectors on-site. (Rule 1421)
- 8. If a visible leak of particulate matter is detected from a Rotex Flex Sock (or equivalent), the component shall be repaired or replaced with in 24 hours of detection or by the end of the batch, whichever occurs first, or shall be taken out of service until full repairs can be completed. If such a leak is detected on a Saturday or Sunday operating day and the leak is not the result of a catastrophic failure of the component and is not the source of particulate emissions that are readily visible and exceed 10 percent opacity, full repairs may be delayed until the following Monday. (Rule 1421)
- 9. If a leak is detected from other components or emission points and if a permanent or temporary repair cannot be completed by the sooner of the completion of the current production batch, or within 24 hours of detection, whichever occurs first, repairs shall be made as soon as is feasible but not later then 72 hours after detection or the equipment shall be taken out of service. (Rule 1421)
- 10. Fugitive emissions at material transfer points that are not captured by hoods, shrouds, scoops and/or tarpaulins and around equipment shaft seals shall not be considered particulate matter leaks for the purposes of this Permit to Operate provided that such emissions are minimized to the extent practicable, are not in Violation of Rule 50, and are not the result of damaged equipment.
- 11. The Permittee shall maintain daily records of inspection required herein. Such records shall include the date of each inspection, the name of the person conducting the inspection, the time and date any visible particulate matter leak is detected, and the time and date that such leak was repaired. Separate records of repairs may be maintained provided they are readily available for district inspection. Non-operating days for the plant shall be recorded as such. The person conducting the inspection shall initial the inspection record on a daily basis after each inspection has been made and the required information recorded. A 3% data loss allowance, determined on a calendar year basis and by comparing inspection day records with total operating days, shall apply to these inspection records. (Rule 1421)
- 12. All records required by this Permit to Operate shall be maintained on-site for a period not less than three years and shall be made readily available for District inspection upon request. (Rule 20.3)
- 13. An unrecorded leak shall be considered a Violation of this Permit to Operate except that a single, unrecorded leak in a gravity feed system component found by the District shall not be a Violation if the component was inspected by the Permittee during the current or preceding operating day and no leak was present during that previous inspection and a record of the inspection and inspection results is available. (Rule 1421)
- 14. Whenever the hopper above Blender 9 is attached to the process line or is used to process material the breather vent shall be covered with a pleated air filter. (Rule 1421)
- 15. The inlet ports, outlet port and access doors shall be covered or closed whenever material is being processed or packaged through the hopper above Blender 9. (Rule 1421)
- 16. No solvents other than those used for maintenance and repairs shall be used in processing product through the packaging plant. (Rule 1421)
- 17. All transfer points between the blender and the bag lined box being filled shall be enclosed and vented to a bag-house. (Rule 20.3)
- 18. All receiving hoppers and associated screens shall be vented to a baghouse. [Rule 20.3]



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2021-APP-006710

PERMIT ID APCD2005-PTO-001676

- 19. The Baghouse shall be equipped with a pressure differential gauge installed in a manner so as to be easily read by the Operator or an Inspector. The gauge lines shall be inspected for functionality at least once per calendar year within 120 days of Permit expiration date. (Rule 1421)
- 20. The Permittee shall conduct a visible emissions evaluation of the Baghouse exhausts each calendar month and maintain records of such evaluation on-site for 5 years. The records shall be made available to the District upon request. (Rule 1421)
- 21. The filters shall be inspected at least once per calendar year within 120 days of Permit expiration date and shall be changed if damaged. At a minimum, records for the annual maintenance/inspection shall be maintained for the Dust Control System. The records shall be maintained on-site for 5 years and made available to the District upon request. (Rule 1421)
- 22. The bag-house emissions for per-lite storage and transfer system bag-houses shall not exceed 20% opacity at any time. (Rule 50)
- 23. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 24. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 25. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2017-APP-005125

APCD2019-PTO-003410

CP Kelco US, Inc.

2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US, Inc. Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US, Inc. 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Vibrating Screen/Sieve: Cleveland, Model HKC-30, 0.75 tons/hr capacity, S/N 17Z0831. To be used with equipment under permits APCD2005-PTO-001676, APCD2009-PTO-901285, and APCD2009-PTO-000489.

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: 11535

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air Pollution Control Equipment shall be maintained in good operating condition and shall be in full operation in accordance with manufacturer's instructions at all times when the process equipment is in operation. (Rule 51)
- 2. All process and emission control equipment outside the building enclosures shall be maintained and operated so that there are no visible particulate leaks to the atmosphere prior to treatment in the respective Air Pollution Control System. (Rule 1421)
- 3. The permittee shall implement a particulate matter leak inspection, maintenance and repair program for process equipment and emissions capture and control equipment inside the building enclosures and shall include all items specified in this Permit to Operate. [Rule 1421]
- 4. On each day that the equipment is operating, the permittee shall conduct an inspection of the equipment, while in operation, for visible particulate matter leaks, including product conveyance duct systems, Rotex screens, screens, access doors, clamped surfaces, boots, magnets, blenders, feed screws, and stray dust emissions. [Rule 1421]
- 5. The permittee shall have replacement Rotex Flex Socks or equivalent flexible connectors on-site. [Rule 1421]



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2017-APP-005125

PERMIT ID
APCD2019-PTO-003410

- 6. If a visible leak of particulate matter is detected from a Rotex Flex Sock (or equivalent), the component shall be repaired or replaced with in 24 hours of detection or by the end of the batch, whichever occurs first, or shall be taken out of service until full repairs can be completed. If such a leak is detected on a Saturday or Sunday operating day and the leak is not the result of a catastrophic failure of the component and is not the source of particulate emissions that are readily visible and exceed 10 percent opacity, full repairs may be delayed until the following Monday. [Rule 1421]
- 7. If a leak is detected from other components or emission points and if a permanent or temporary repair cannot be completed by the sooner of the completion of the current production batch, or within 24 hours of detection, whichever occurs first, repairs shall be made as soon as is feasible but not later then 72 hours after detection or the equipment shall be taken out of service. [Rule 1421]
- 8. Fugitive emissions at material transfer points that are not captured by hoods, shrouds, scoops and/or tarpaulins and around equipment shaft seals shall not be considered particulate matter leaks for the purposes of this Permit to Operate provided that such emissions are minimized to the extent practicable, are not in Violation of Rule 50, and are not the result of damaged equipment. [Rule 1421]
- 9. The permittee shall maintain daily records of inspection required herein. Such records shall include the date of each inspection, the name of the person conducting the inspection, the time and date any visible particulate matter leak is detected, and the time and date that such leak was repaired. Separate records of repairs may be maintained provided they are readily available for district inspection. Non-operating days for the plant shall be recorded as such. The person conducting the inspection shall initial the inspection record on a daily basis after each inspection has been made and the required information recorded. A 3% data loss allowance, determined on a calendar year basis and by comparing inspection day records with total operating days, shall apply to these inspection records. [Rule 1421]
- 10. All records required by this Permit to Operate shall be maintained on-site for a period not less than three years and shall be made readily available for District inspection upon request. [Rule 1421]
- 11. An unrecorded leak shall be considered a Violation of this Permit to Operate except that a single, unrecorded leak in a gravity feed system component found by the District shall not be a Violation if the component was inspected by the Permittee during the current or preceding operating day and no leak was present during that previous inspection and a record of the inspection and inspection results is available. [Rule 1421]
- 12. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 13. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 14. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 App ID: APCD2011-APP-001715

PERMIT ID APCD2007-PTO-001516

CP Kelco US Inc **Environmental Manager Edgardo Morale** 2025 East Harbor Dr San Diego CA, 92113

EQUIPMENT ADDRESS CP Kelco US Inc Environmental Manager Edgardo

2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Bio-Polymer Manufacturing Operation consisting of the following equipment:

- three (3) TK mixers, Nos. 1, 2, and 3;
- three (3) IPA filters;
- three (3) press enclosures, Nos. 1, 2, and 3;
- three (3) spent pumps and three (3) spent pots;
- one (1) precipitation pump;
- one (1) hydrocyclone;
- one (1) inline grinder;
- one (1) filter assembly;
- three (3) product fans;
- twelve (12) cyclones;
- nine (9) dryers and nine (9) dryer fans;
- five (5) fitzmills:
- one (1) IPA booster pump;
- three (3) rotary dewatering screens;
- one (1) gellan platform (broth filtration system);
- one (1) constant boiling mixture (CBM) day tank; and
- six (6) baghouses:

Distillation: three (3) distillation columns, Nos. 1, 2, and 3, rated at 200, 200, and 320 gpm, respectively; a fugitive VOC ventilation system as described in the most recent District-approved SRS O&M program;

Solvent Recovery System (SRS): three (3) regenerative carbon adsorber beds, capable of operating at a combined maximum rate of 52,000 DSCFM, with each bed containing 28,000 lbs of carbon, and a pre-conditioning unit as described in the most recent District-approved SRS O&M program; and an onsite monitoring system as described in the most recent District-approved SRS O&M program.

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Revision Date: 04/12/2018 Page 1 of 4 Print Date: Oct 22, 2025 Version History# 4

APC050 - Ver: 1.4



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

PHONE (858) 586-2600 Fax (858) 586-2601 www.sdapcd.org

Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2011-APP-001715

APCD2007-PTO-001516

Fee Schedules: 1 [92Q] VOC Source Test

7 [22D] Mixer System

7 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

9 [30A] Kelp & Biogum Products Solvent Dryer

BEC: APCD2013-CON-000625

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. The combined annual emissions of volatile organic compounds (VOCs) from the facility shall not exceed 135 tons. This equates to the production of approximately 15,000 tons of bio-gum per year. (Rule 20.3)
- 2. Except as provided in Rule 67.10(d)(1), the VOC emissions from the following dryers (PTO#APCD2007-PTO-001516) shall be vented to the solvent recovery system (SRS): Dryer/Cyclones Nos. 1A, 1B, 1C, 2A, 2B, 2C, 3A, 3B, and 3C; Dryer to Mill Feed Cyclones Nos. 1, 2, and 3; and baghouses 1A, 1B, 2A, 2B, 3A, and 3B. (Rule 67.10)
- 3. The Solvent Recovery System (SRS) shall be in operation at all times in accordance with Rule 67.10 while VOC's are being exhausted to the SRS. (Rule 67.10)
- 4. A system that controls the bypass dampers in the exhaust ductwork carrying VOC emissions from the bio-polymer manufacturing lines to the SRS shall be operated such that the bypass dampers remain closed when the respective lines are emitting VOCs required to be controlled pursuant to District Rule 67.10. (Rules 21 and 67.10)
- 5. The individual press systems shall not be operated unless the press ventilation system is operating under negative pressure, and the SRS is in operation, and the press doors are closed pursuant to Rule 67.10(d)(4). (Rule 67.10)
- 6. The drying systems shall shut down when the VOC concentration from the most saturated carbon bed exceeds 50 ppmV (measured as propane). The drying system shall be restarted only when the VOC concentration is below 25 ppmV (measured as propane). (Rule 67.10)
- 7. Permittee shall measure and record the hourly concentration of the most saturated carbon bed. (Rule 21)
- 8. The most saturated carbon bed of the carbon beds shall be taken out of service to be steam regenerated within two hours from when the exhaust from the most saturated bed exceeds 50 ppmV (measured as propane) VOC concentration. The bed shall be steam stripped and air dried prior to returning it to service. (Rule 67.10)
- 9. The exhaust gas flow rates from the individual dryers and ventilation systems shall be adjusted to ensure that the total exhaust gas flow rate to the SRS does not exceed 52,000 DSCFM. A weekly record of the total exhaust gas flow rate shall be recorded. (Rules 21 and 67.10)
- 10. All process pumps processing VOC-containing material shall be equipped with dual mechanical seals, or another leak-free technology that has been approved in writing by the District. (Rule 67.10)
- 11. All in-process tanks for VOC-containing material shall be equipped with an apparatus or cover, which completely covers the tank but not necessarily provides a vapor tight seal, and which is closed or in place at all times except as necessary to meet operating requirement or for maintenance. (Rule 67.10)
- 12. Equipment, devices, and systems used to transport and control VOC emissions (including ducting extending from the outlet of the press ventilation systems, the outlet of the baghouses associated with IPA dryers, valves, and blower housing dryer mills on Lines 1, 2, & 3) shall be maintained free of visible holes, visible breaks, visible openings, or visible separations between adjoining components, that are not consistent with their design and intended operating function, from which fugitive VOC vapors are emitted to the atmosphere. (Rule 67.10)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2011-APP-001715

APCD2007-PTO-001516

- 13. All components including, piping, valves, fittings, tanks, stills, process equipment and other devices used to transport, store, react or process VOC-containing materials (including spent IPA pots, process pumps and press doors) shall be maintained and operated free of fugitive liquid leaks, except for leaks identified, recorded, tagged and repaired or bypassed in accordance with the following requirements.
 - a. A leak shall be deemed by-passed when there is no potential for loss of VOC or materials containing VOC; and
 - b. The repairs are completed or the leak is by-passed within 72 hours of detection, delayed until the leaking equipment is next scheduled to be offline or delayed until the production cycle is completed, whichever comes first; and
 - c. The time, date and location of the leak are recorded promptly following detection and made available to the District upon request; and
 - d . All practicable steps to minimize the magnitude of the leak are taken as soon as possible following detection. (Rule 67.10, Rule 21)
- 14. The component and/or process with the fugitive leaks shall not be returned to service until repairs are completed. This condition shall not apply to liquid losses occurring during maintenance, cleaning, repair, or back flushing of process and storage equipment. Any liquid leak contained by a capture system connected to the SRS shall not be considered a fugitive liquid leak. (Rule 21)
- 15. For the purposes of this permit, a fugitive liquid leak is a visible leak of liquid, containing greater than 10 percent by weight VOC, at a rate in excess of three drops per minute, or a visible mist. (Rule 67.10, Rule 21)
- 16. A visual inspection for fugitive liquid leaks of all piping, valves, fittings, tanks, stills, process equipment and other devices used to transport, store, react or process materials containing VOC shall be performed at least monthly. An alternative inspection schedule and program may be used provided such schedule and program have been approved, in advance, by the District. (Rule 67.10)
- 17. All process equipment shall be maintained and operated so that there is no leakage of particulate matter to the atmosphere prior to their treatment in the air pollution control system. Dry particulate matter discharged from an opening such as a hole or slit in process equipment or ducting which falls immediately to surfaces below the hole or slit and does not remain airborne shall not be considered leakage. (Rule 20.3)
- 18. The baghouses and filter elements shall be operated in the differential pressure range greater than 0 inches water column (wc) and less than 8 inches wc when the process equipment is in operation. Pressure drop measurements shall be taken weekly. (Rule 20.3)
- 19. A differential pressure gauge shall be maintained across the preconditioning unit particulate matter pre-filter to provide an indication of filter condition. The inlet to the SRS Particulate Matter pre-filter shall be maintained at a negative gauge pressure except during maintenance and calibration activities. The pre-filter differential pressure gauge lines shall be cleaned at least annually. (Rule 20.3)
- 20. The baghouses and filter elements shall be equipped with operational and accessible differential pressure gauge. The gauge lines shall be inspected for functionality at least once per calendar year within 90 days of the permit expiration month. (Rule 20.3)
- 21. Except for momentary, non-repeatable readings, visible emissions from processing equipment shall not exceed 20 percent (%) opacity at any time. (Rule 50)
- 22. The SRS, fugitive VOC ventilation system, and onsite monitoring equipment shall be operated, maintained, and calibrated if necessary, in accordance with the most recent District-approved operation and maintenance (O&M) program. Whenever revised, the O&M program shall be submitted to the District and approved by the District prior to implementation. Each O&M program submitted for approval shall:
 - a. Maintain the VOC emission reduction efficiency required pursuant to District Rule 67.10; and
 - b. Identify and maintain all key system operating parameters, such as temperature, pressure, and/or flow rate, necessary to maintain the VOC emission reduction efficiency required pursuant to District Rule 67.10; and
 - c. Include proposed inspection schedules, anticipated ongoing maintenance steps and proposed daily recordkeeping practices regarding the key system operating parameters.
 - Each O&M program does not need to include inspection, maintenance or recordkeeping relevant to compliance with Rule 67.10(d)(7). (Rule 67.10)



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

PHONE (858) 586-2600 Fax (858) 586-2601 www.sdapcd.org

Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2011-APP-001715

PERMIT ID APCD2007-PTO-001516

- 23. This equipment shall be source tested once each permit year (annual source test) to demonstrate compliance with the following standards. The tests and/or observations of the equipment shall be conducted during a period of at least 16 hours, but not more than 24 hours. Compliance determinations may be demonstrated through tests or observations for a shorter period of time provided such period of time has been determined appropriate in writing by the District.
 - a. The total emissions of VOC to the atmosphere from all dryers used in conjunction with all bio-polymer manufacturing process lines shall be reduced by at least 95 percent by weight. This requirement shall not apply to dryers whose exhaust contains VOC at an average concentration of 200 ppmv or less over a complete batch or cycle. Emissions of VOC occurring during the transfer of materials containing VOC into or out of a dryer shall be included when determining emissions from that dryer.
 - b. The combined capture and control efficiency for VOC emissions to the atmosphere from presses and spent pots shall be at least 75 percent by weight. This standard shall not apply during maintenance, cleaning, repair, or back flushing of the press systems. (Rule 67.10)
- 24. Source testing shall be conducted at typical process loads and flow rates to determine the VOC control efficiency. (Rule 21)
- 25. For the purposes of this permit to operate, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. All source tests shall be performed or witnessed by the District. (Rule 21)
- 26. If this testing will be performed by someone other than the District, a source test protocol shall be submitted to the District for written approval at least 60 days prior to source testing. (Rule 21)
- 27. Permittee shall maintain the following records on site for at least five (5) years. All records shall be available to the District upon request:
 - a. Monthly production records;
 - b. Hours of operation;
 - c. Hourly concentration readings of the most saturated carbon bed;
 - d. Date and time the most saturated carbon bed is removed from service for regeneration;
 - e. Weekly differential pressure gauge readings for baghouses 1A, 1B, 2A, 2B, 3A and 3B;
 - f. Weekly measurements of the total exhaust gas flow rate from the individual dryers and ventilation systems;
 - g. Monthly visual inspection of fugitive liquid leaks;
 - h. Annual inspection records of the filters for baghouses 1A, 1B, 2A, 2B, 3A and 3B;
 - i. Dates of the annual cleaning of the pre-filter differential pressure gauge lines;
 - j. A copy of the most recent District-approved O&M program;
 - k. Source test results; and
 - I. A current list of all VOC containing materials used in the operation described above. (Rules 21 and 67.10)
- 28. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 29. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 30. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2015-APP-004223

APCD2004-PTO-002185

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 EQUIPMENT ADDRESS
CP Kelco US Inc
Environmental Manager Edgardo
2025 East Harbor Dr
San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.



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Sectors: 5, P

PERMIT ID APCD2004-PTO-002185

Site ID: APCD1976-SITE-00116 **App ID:** APCD2015-APP-004223

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

pilot plant continuous processing system consisting of:

Mixers;

Drying mill;

Mechanical water/solvent reduction devices;

GEA Westfalia cetrifuge;

Flottweg feed pump;

Flottweg solids tank;

Grieves dryer;

Oversize hopper;

Portable hopper/conveyor system;

Screen;

50 cubic foot blender;

Conical blender;

Product mill;

Fitzmill;

4 cyclones;

Stray dust baghouse;

Dryer baghouse;

Spent IPA pot;

Slurry cooler;

Filter assembly:

30 inch screen;

a bag breaking station; and,

fugitive VOC collection system and ducting vented to 6-ft diameter 12,000 cfm Duall water scrubber with 48-ft packed bed and mist eliminator

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 0.5 [92Q] VOC Source Test

1 [30A] Kelp & Biogum Products Solvent Dryer

1 [22D] Mixer System

2 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: 0423A

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

1. All equipment associated with air contaminant emissions from this operation or that affects the air contaminant emissions shall not deviate from the above equipment description. The permittee shall submit an application to the District and wait for approval in writing prior to modifying any such equipment. (Rule 10)



PHONE (858) 586-2600 Fax (858) 586-260 www.sdapcd.org

Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2015-APP-004223

PERMIT ID
APCD2004-PTO-002185

- 2. Air Pollution Control Equipment shall be maintained in good operating condition and shall be functioning according to manufacturer instructions or Standard Operating and Maintenance Practices (SOPs) at all times when the process equipment is in operation except as otherwise allowed in this Permit. The O&M Programs Required under 67.10 (D)(9) satisfy the above mentioned SOP Requirement for VOC control equipment installed pursuant to Rule 67.10.
- 3. All process equipment shall be maintained and operated so that there is no leakage of air contaminants to the atmosphere prior to their treatment in the Air Pollution Control System. Dry particulate matter discharged from an opening such as a hole or slit in process equipment or ducting which falls immediately to surfaces below the hole or slit and does not remain airborne shall not be considered leakage.[Rule 1421]
- 4. The fugitive emissions collection systems gas flow rates shall not exceed 1,000 SCFM as evaluated during the source test. (Rule 1421)
- 5. The exhaust flow rate from the water scrubber, measured during the source test, shall not exceed 13,500 DSCFM. (Rule 1421)
- 6. The scrubber liquid flow rate shall be maintained at 171 liters per minute (45 gallons per minute) or greater while any one of the above driers is in operation and at 228 liters per minute (60 gallons per minute) or greater while more than one drier is in operation. A minimum scrubber water header pressure of 0.2 bar (3 PSIG) shall be maintained. (Rule 1421)
- 7. The scrubber liquid flow rate shall be maintained at 378 liters per minute (100 gallons per minute) or greater while any one of the above driers is operating at the same time as all driers from the biogum pilot plant are in operation. The minimum scrubber water header pressure shall be maintained at 0.2 bar (3 PSIG). (Rule 1421)
- 8. The liquid temperature at the scrubber spray header shall be maintained at a daily average temperature of 27 deg C (80 deg F) or lower when the scrubber is operating. (Rule14 21)
- 9. Ducting extending from the outlet of the bag-houses associated with pilot plant isopropyl alcohol dryers, including valves and blower housing, shall be maintained and operated free of visible holes, breaks, openings or separations between adjoining components, that are not consistent with their design and intended operating function, from which fugitive VOC vapors would be emitted. (Rule 67.10)
- 10. The scrubber shall use fresh water (as opposed to recirculated) at all times. This requirement does not apply if both pilot plants are placed in standby status. Under this condition the scrubber bottoms may be re-circulated after the first 30 minutes of such standby status. (Rule 1421)
- 11. All process equipment and piping, specifically the pump seals, press shaker collection pot, and spent IPA pots, shall be maintained and operated in compliance with Rule 67.10 (d)(8).
- 12. Repair of a fugitive liquid leak may be delayed until the leaking equipment is scheduled to be off-line, or the production cycle is complete, or within 72 hours of detection, whichever occurs first, if the time, date and location of the leak are promptly recorded after detection and all practical steps to minimize the magnitude of the leak are taken as soon as possible following detection. (Rule 67.10)
- 13. The temperature of the liquid process mixtures containing VOCs shall not exceed 46 deg C (115 deg F) before entering the press. Temperature records shall be maintained in accordance with the most recent District-approved PR&D Rule 67.10 O&M program and made available to the District upon request. (Rule 67.10)
- 14. The baghouse shall be equipped with pressure differential gauges. The gauge lines and filters shall be inspected for functionality at least once per calendar year. Baghouse pressure monitors shall be calibrated and maintained annually to ensure proper measurement. If a baghouse is not used in a calendar year, the records shall indicate its non-operation and no inspection is required for that calendar year. (Rule 1421)
- 15. Differential pressure across the baghouse filters shall be maintained between 0.25 and 7.0 inches of water when operating, except during start-up, shut-down and momentary fluctuations not too exceed five-minutes in any 60 minute period. (Rule 1421)
- 16. The filters shall be inspected at least annually and shall be replaced if damaged. Maintenance and inspection of the filters shall be recorded. If a baghouse is not used in a calendar year, the records shall indicate its non-operation status and no inspection or maintenance will be required for that calendar year. (Rule 1421)

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COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

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Site ID: APCD1976-SITE-00116 **App ID:** APCD2015-APP-004223

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APCD2004-PTO-002185

- 17. The fugitive emission system and R&D pilot plants IPA scrubber shall be inspected in accordance with the most recent District-approved operation and maintenance program. A copy of the O&M program shall be maintained on-site and made available to the District inspector upon request. (Rule 67.10(d)(9))
- 18. Permittee shall adhere to the most recent District-approved operation and maintenance procedure for the pilot plants IPA scrubber. (Rule 67.10)
- 19. This equipment shall be source tested once every two permit years to demonstrate compliance with the emission standards contained in this permit. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. The source test shall be performed or witnessed by the District. (Rule1421)
- 20. The permittee shall maintain the following records on site for at least five (5) years. These records shall be made available to the District upon request. Measurements and records are not required during periods of maintenance, repair, and breakdown.
 - a. monthly differential pressure readings across the filters;
 - b. monthly scrubber liquid flow rate readings;
 - c. monthly scrubber water header pressure readings;
 - d. monthly fugitive liquid leak checks;
 - e. daily average scrubber liquid temperature readings;
 - f. dates and times of maintenance, repair, and breakdown;
 - g. monthly biogum production weight; and,
 - h. annual Equivalent Annual Biogum Production weight. (Rule 67.10(e))
- 21. Equivalent Annual Biogum Production (EABP) shall not exceed 92.9 tons per year using the following formula: EABP = 92.9 tons x [(annual tons of Gellan Gum) divided by (92.9 tons of Gellan Gum) + (annual tons of Xanthan Gum) divided by (157.5 tons of Xanthan Gum)]. (Rule 20.3)
- 23. At no time shall the subject equipment cause or contribute to a nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the applicant will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment, the applicant shall receive prior District approval by applying for and obtaining an authority to construct for all such modifications. (Rule 51)
- 24. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 22. The permittee shall notify the Air Pollution Control Officer of any occurrence which constitutes a breakdown condition as specified in District Rule 98. This notification shall identify the time of the start of the occurrence, estimated duration of the occurrence (if known), specific location, equipment involved, and (to the extent known) the cause(s) of the occurrence, and shall be given as soon as reasonably possible, but no later than two hours after its detection. This notification shall be by direct phone contact to District Compliance staff during normal working hours or to the District's message recording phone during nonworking hours (858 586-2650). The time of the call must be included in the message.
- 25. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 26. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2012-APP-002150

APCD2004-PTO-940043

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

An isopropyl alcohol (IPA) storage tank, 200,000-GAL. capacity, vented to an Advanced Air Technologies Inc. water scrubber, 18-inch diameter, 250 SCFM capacity, consisting of two 8-foot wetted packed beds operated in series and a mist eliminator, with solvent laden air (SLA) duct work, instrumentation, and valving from the IPA storage tank.

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 0.33 [92Q] VOC Source Test

1 [91A] Miscellaneous

BEC: APCD2014-CON-000933

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. All equipment associated with air contaminant emissions from this operation or that affects the air contaminant emissions shall not deviate from the above equipment description. The permittee shall submit an application to the District and wait for approval in writing prior to modifying any such equipment. (Rule 10)
- 2. The storage tank shall be equipped with a pressure sensor which shall be permanently installed to measure the pressure within the tank. The sensor shall be calibrated in accordance with manufacturer's specifications. (Rule 21)
- 3. The storage tank pressure shall be maintained above a negative pressure of 0.86 inches water column (WC) and the tank exhaust valve shall be set to operate prior to the tank pressure of 1.0 PSIG. The Permittee shall monitor and record the storage tank pressure at one hour intervals. (Rule 67.10)
- 4. The scrubber columns shall be equipped with a volumetric flow meter which shall be permanently installed to measure the liquid flow rate to the columns. The flow meter shall be calibrated in accordance with manufacturer's specifications. (Rule 21)

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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2012-APP-002150

PERMIT ID
APCD2004-PTO-940043

- 5. The scrubber liquid flow rate shall be greater than two (2) GPM into the columns during scrubber operation. The volumetric flow meter shall be operating during all scrubber operations. The flow readings shall be recorded at least once each time the scrubber operates. (Rule 21)
- 6. The scrubber shall be operated to maintain a VOC reduction of at least 95%, by maintaining the operating parameters as described in this permit to operate and the approved O&M program. (Rule 21)
- 7. The permittee shall have records indicating the following:
 - a. The flow rate of the liquid during scrubber operation;
 - b. The pressure readings of the IPA storage tank; and,
 - c. The dates and times of maintenance, repair and breakdown.

These records shall be maintained on site for five years in accordance with the most recent District approved O&M program and any manufacturer specifications. These materials including the O&M program and manufacturer specifications shall be made available to the District upon request. Recordkeeping and monitoring are not required during periods of maintenance, repair and breakdown. (Rule 67.10)

- 9. This equipment described above shall be source tested once every third permit year to demonstrate compliance with District emission standards. For the purposes of this permit, a permit year is the 12-month period ending on the last day of the permit expiration month. It is the responsibility of the permittee to schedule the source test with the District. (Rule 21)
- 10. The scrubber shall be operated to maintain a VOC reduction efficiency of 95 percent. The efficiency of the scrubber when source tested will be evaluated during operational time periods excluding any continuous 30 minute period for start up and any continuous 30 minute period for shut down of the scrubber system. The operation of the scrubber during other time periods will be in accordance with the most current District approved operating plan. (Rule 21)
- 11. If this testing will be performed by someone other than the District, a source test protocol shall be submitted to the District for written approval at least 60 days prior to source testing. (Rule 21)
- 12. At no time shall the subject equipment cause or contribute to a public nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the permittee will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment the permittee shall apply for and obtain an Authority to Construct for all such modifications prior to making any physical change. (Rule 51)
- 13. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 8. The permittee shall notify the Air Pollution Control Officer of any occurrence which constitutes a breakdown condition as specified in District Rule 98. This notification shall identify the time of the start of the occurrence, estimated duration of the occurrence (if known), specific location, equipment involved, and (to the extent known) the cause(s) of the occurrence, and shall be given as soon as reasonably possible, but no later than two hours after its detection. This notification shall be by direct phone contact to District Compliance staff during normal working hours or to the District's message recording phone during nonworking hours (858 586-2650). The time of the call must be included in the message.
- 14. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 15. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)



COUNTY OF SAN DIEGO, AIR POLLUTION CONTROL DISTRICT 10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649

PHONE (858) 586-2600 Fax (858) 586-2601 www.sdapcd.org

Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD2011-APP-001836

APCD2004-PTO-940006

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 EQUIPMENT ADDRESS
CP Kelco US Inc
Environmental Manager Edgardo

2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

Biogum pilot plant consisting of:

Fermentation tanks;

Sharples model P3000 solid-bowl decanter;

Union model HTD 60 homogenizer;

Buflovak 42 dia. X 36 model ADDD double-drum dryer;

48" screen;

drum dryer, 220 sq. ft.;

Strong Scott model TJS-8 turbulizer;

Rietz model RE-6-K5F418 extructor;

6,000 gallon process tank;

Semiworks stacked disk centrifuge;

Biogum mixing tank;

Biogum reslurry tank;

Biogum water powder mixer; and,

a stray dust baghouse.

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [91A] Miscellaneous

BEC: APCD2014-CON-000826

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES



COUNTY OF SAN DIEGO. AIR POLLUTION CONTROL DISTRICT **10124 OLD GROVE ROAD, SAN DIEGO, CA 92131-1649**

PHONE (858) 586-2600 Fax (858) 586-2601 www.sdapcd.org

Sectors: 5, P

PERMIT ID APCD2004-PTO-940006

APCD1976-SITE-00116 Site ID: App ID: APCD2011-APP-001836

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- All equipment associated with air contaminant emissions from this operation or that affects the air contaminant emissions shall not deviate from the above equipment description. The permittee shall submit an application to the District and wait for approval in writing prior to modifying any such equipment. (Rule 10)
- Emissions of volatile organic compounds from the equipment from processing biomass shall not exceed 10 pounds per 2. day. This equates to the processing of 10,000 pounds of dry biomass in one day excluding water weight. (Rule 20.3)
- Processing of dry biomass from this equipment shall not exceed 2,600,000 pounds per year excluding water weight. (Rule 20.3)
- The baghouse shall be equipped with pressure differential gauges. The gauge lines and filters shall be inspected for functionality at least once per calendar year. Baghouse pressure monitors shall be calibrated and maintained annually to ensure proper measurement. If a baghouse is not used in a calendar year, the records shall indicate its non-operation and no inspection is required for that calendar year. (Rule 21)
- Differential pressure across the baghouse filters shall be maintained between 0.25 and 7.0 inches of water during 5. operation, except during start-up, shut-down and momentary fluctuations not too exceed five-minutes in any 60 minute period. (Rule 21)
- Permittee shall maintained the following records on site for five years and make them available to the District upon 7. reguest. Records and measurements are not required during periods of maintenance, repair, and breakdown. Extended periods of non-operation shall be indicated.
 - a. monthly differential pressure readings across the baghouse filters, or statement of non-operation;
 - b. dates and times of maintenance, repair, and breakdown, or statement of non-operation;
 - c. daily dry weight of biomass processed; and,
 - d. annual dry weight of biomass processed.

(Rule 21)

- At no time shall the subject equipment cause or contribute to a nuisance as specified in District Rule 51. If compliance with Rule 51 cannot be demonstrated to the satisfaction of the District, the applicant will take whatever corrective action necessary to meet applicable requirements. If corrective action requires any physical change or modification to the subject equipment, the applicant shall receive prior District approval by applying for and obtaining an authority to construct for all such modifications. (Rule 51)
- Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon 9. request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- The permittee shall notify the Air Pollution Control Officer of any occurrence which constitutes a breakdown condition as 6. specified in District Rule 98. This notification shall identify the time of the start of the occurrence, estimated duration of the occurrence (if known), specific location, equipment involved, and (to the extent known) the cause(s) of the occurrence, and shall be given as soon as reasonably possible, but no later than two hours after its detection. This notification shall be by direct phone contact to District Compliance staff during normal working hours or to the District's message recording phone during nonworking hours (858 586-2650). The time of the call must be included in the message.
- 10. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 11. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)

Revision Date: 05/02/2014 Page 2 of 2 Print Date: Oct 22, 2025 Version History# 4 APC050 - Ver: 1.4



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Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973084

APCD2005-PTO-973084

CP Kelco US Inc Environmental Manager Edgardo Morale 2025 East Harbor Dr San Diego CA, 92113 **EQUIPMENT ADDRESS**

CP Kelco US Inc Environmental Manager Edgardo 2025 East Harbor Dr San Diego CA 92113

PERMIT TO OPERATE

This permit is not valid until required fees are received by the District.

The above is hereby granted a Permit To Operate the article, machine, equipment or contrivance described below. This permit is not transferable to a new owner nor is it valid for operation of the equipment at another location except as specified. This Permit To Operate or copy must be posted on or within 25 feet of the equipment, or readily available on the operating premises.

EQUIPMENT OWNER

CP Kelco US Inc Owner Manager 2025 East Harbor Dr, San Diego, CA 92113

EQUIPMENT DESCRIPTION

SIFTER, KELCO S/N K07966. 973084AFS17AUG1999 975672 (10/00)(980627 ALC 02/05)

Every person who owns or operates this equipment is required to comply with the conditions listed below and all applicable requirements and District rules, including but not limited to Rules 10, 20, 40, 50, 51.

Fee Schedules: 1 [22C] Shaker Stack/Screen Set/Pelletizer/Grain Cleaner

BEC: 11535

FAILURE TO OPERATE IN COMPLIANCE IS A MISDEMEANOR SUBJECT TO CIVIL AND CRIMINAL PENALTIES

A. FEDERALLY-ENFORCEABLE AND DISTRICT-ENFORCEABLE CONDITIONS

- 1. Air Pollution Control Equipment shall be maintained in good operating condition and shall be in full operation in accordance with manufacturer's instructions at all times when the process equipment is in operation. (Rule 51)
- 2. All process and emission control equipment outside the building enclosures shall be maintained and operated so that there are no visible particulate leaks to the atmosphere prior to treatment in the respective Air Pollution Control System. (Rule 1421)
- 3. The permittee shall implement a particulate matter leak inspection, maintenance and repair program for process equipment and emissions capture and control equipment inside the building enclosures and shall include all items specified in this Permit to Operate. (Rule 1421)
- 4. On each day that the equipment is operating, the permittee shall conduct an inspection of the equipment, while in operation, for visible particulate matter leaks, including product conveyance duct systems, Rotex screens, screens, access doors, clamped surfaces, boots, magnets, blenders, feed screws, and stray dust emissions. (Rule 1421)
- 5. The permittee shall have replacement Rotex Flex Socks or equivalent flexible connectors on-site. (Rule 1421)



ONE (858) 586-2600 Fax (858) 586-2 www.sdapcd.org

Sectors: 5, P

Site ID: APCD1976-SITE-00116 **App ID:** APCD1999-APP-973084

PERMIT ID
APCD2005-PTO-973084

- 6. If a visible leak of particulate matter is detected from a Rotex Flex Sock (or equivalent), the component shall be repaired or replaced with in 24 hours of detection or by the end of the batch, whichever occurs first, or shall be taken out of service until full repairs can be completed. If such a leak is detected on a Saturday or Sunday operating day and the leak is not the result of a catastrophic failure of the component and is not the source of particulate emissions that are readily visible and exceed 10 percent opacity, full repairs may be delayed until the following Monday. (Rule 1421)
- 7. If a leak is detected from other components or emission points and if a permanent or temporary repair cannot be completed by the sooner of the completion of the current production batch, or within 24 hours of detection, whichever occurs first, repairs shall be made as soon as is feasible but not later then 72 hours after detection or the equipment shall be taken out of service. (Rule 1421)
- 8. Fugitive emissions at material transfer points that are not captured by hoods, shrouds, scoops and/or tarpaulins and around equipment shaft seals shall not be considered particulate matter leaks for the purposes of this Permit to Operate provided that such emissions are minimized to the extent practicable, are not in Violation of Rule 50, and are not the result of damaged equipment. (Rule 1421)
- 9. The permittee shall maintain daily records of inspection required herein. Such records shall include the date of each inspection, the name of the person conducting the inspection, the time and date any visible particulate matter leak is detected, and the time and date that such leak was repaired. Separate records of repairs may be maintained provided they are readily available for district inspection. Non-operating days for the plant shall be recorded as such. The person conducting the inspection shall initial the inspection record on a daily basis after each inspection has been made and the required information recorded. A 3% data loss allowance, determined on a calendar year basis and by comparing inspection day records with total operating days, shall apply to these inspection records. (Rule 1421)
- 10. All records required by this Permit to Operate shall be maintained on-site for a period not less than three years and shall be made readily available for District inspection upon request. (Rule 1421)
- 11. An unrecorded leak shall be considered a Violation of this Permit to Operate except that a single, unrecorded leak in a gravity feed system component found by the District shall not be a Violation if the component was inspected by the Permittee during the current or preceding operating day and no leak was present during that previous inspection and a record of the inspection and inspection results is available. (Rule 1421)
- 12. Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District. [Rule 19]

B. DISTRICT-ONLY ENFORCEABLE CONDITIONS

- 13. This Air Pollution Control District Permit does not relieve the holder from obtaining permits or authorizations required by other governmental agencies.
- 14. The permittee shall, upon determination of applicability and written notification by the District, comply with all applicable requirements of the Air Toxics "Hot Spots" Information and Assessment Act (California Health and Safety Code Section 44300 et seq.)

APPENDIX B: RULE REFERENCE TABLE

Rule Citation ¹	RULE TITLE	A/R ²	District Adoption Date ³	SIP FR Approval Date
	REGULATION I - GENERAL PROVISIONS			
1	Title	F	04/30/80	09/28/81
2	Definitions	F	7/11/17	11/12/20
4	Review of Rules	F	01/01/70†	09/22/72
5	Authority to Arrest	F	03/24/76†	NA
6	Minor Violations	D	12/15/99	N/A
0	Timor violations		12/13/77	1 1/11
	REGULATION II - PERMITS			
10	Permits Required	F	07/25/95	03/11/98
10.1††	NSPS & NESHAPS Requirements	D	11/8/76	N/A
11	Exemptions from Rule 10 Permit Requirements	F	07/08/20	10/28/22
		D	10/13/22	Pending
12	Registration of Specified Equipment	D	11/15/00	N/A
12.1	Portable Equipment Registration	D	05/21/97	N/A
14	Applications	F	04/30/80	09/28/81
15	Permit Process - Public Notifications	D	09/18/90	N/A
17	Cancellation of Applications	F	04/06/93	03/11/98
18	Action on Applications	D	09/18/90	N/A
19	Provision of Sampling and Testing Facilities	F	04/06/93	03/11/98
19.1††	NSPS & NESHAPS Provision of Sampling and Testing Facilities Requirements	D	11/08/76	N/A
19.2	Continuous Emission Monitoring Requirements	F	01/12/79	09/28/81
		D	10/12/23	Pending
19.3	Emission Information	F	05/15/96	03/09/00
		D	12/09/21	Pending
20	Standards for Granting Permits	F	04/25/89	10/04/18
20.1	NSR - General Provisions	F	10/14/21	09/28/22
20.2*	NSR - Non-major Stationary Sources	F	06/26/19	09/16/20
20.3*	NSR - Major Stationary Source and PSD Stationary Source	F	10/14/21	09/28/22
20.4*	NSR - Portable Emission Units	F	10/14/21	09/28/22
20.5	Power Plants	F	07/05/79	04/14/81
20.6	Standards for Permit to Operate - Air Quality Analysis	F	04/27/16	10/04/18
20.8	Special Offset Requirement Relating to Banking	D	2/16/83	N/A
21	Permit Conditions	F	11/29/94	03/11/98
22	Denial of Applications	D	01/01/69 [†]	N/A
23	Further Information	D	01/01/69†	N/A
24	Temporary Permit to Operate	F	06/29/16	10/04/18
25	Appeals	F	01/01/69†	09/22/72
25	Appeals	D	06/21/00	N/A

26.0	Banking of Emission Reduction Credits (ERCs) - General Requirements	D	06/26/19	N/A
26.1	Standards for Granting Emission Reduction Credits (ERCs)	D	10/22/97	N/A
26.2	Use of Emission Reduction Credits (ERCs)	D	10/22/97	N/A
26.3	Reclassification of Class B Emission Reduction Credits (ERCs)	D	10/22/97	N/A
26.4	Permanency of Banked Emission Reduction Credits (ERCs)	D	10/22/97	N/A
26.5	Transfer of Emission Reduction Credits (ERCs)	D	10/22/97	N/A
26.6	District Banking of Emission Reduction Credits (ERCs)	D	10/22/97	N/A
26.7	Shutdown and Related Emission Unit	D	10/22/97	N/A
26.8	Banking of Limited Emission Reductions	D	10/22/97	N/A
26.9	Emission Reduction Credit Certificates and The Emission Reduction Credit Register	D	10/22/97	N/A
26.10	Banking For BRAC Military Base Closure or Realignment Actions	D	10/22/97	N/A
27	Banking of Mobile Source Emission Reduction Credits	D	11/29/94	N/A
27.1	Federal Requirements for San Diego County APCD Alternative Mobile Source Emission Reduction Program Approved On 9/8/2000	F	08/06/08	06/03/09
	REGULATIONS III - FEES			
40	Permit Fees	D	01/12/23	N/A
42	Hearing Board Fees	D	04/14/22	N/A
44	Technical Reports, Charges for	D	12/7/83	N/A
45	Federally Mandated Ozone Nonattainment Fees	D	6/9/2022	Pending
	REGULATIONS IV - PROHIBITIONS			
50	Visible Emissions	F	08/13/97	12/7/98
50.1††	NSPS & NESHAPS Visible Emissions Requirements	D	11/08/76	N/A
51	Nuisance	F	01/01/69†	09/22/72
52	Particulate Matter	F	01/22/97	12/9/98
52.1††	NSPS & NESHAPS Particular Matter Requirements	D	11/08/76	N/A
53	Specific Contaminants	F	01/22/97	12/9/98
53.1	Scavenger Plants	F	01/01/69†	09/22/72
53.2††	NSPS & NESHAPS Specific Contaminants Requirements	D	11/08/76	N/A
54	Dusts and Fumes	F	01/22/97	12/9/98
54.1	NSPS & NESHAP Dust and Fumes Requirement	D	11/08/76	N/A
55	Fugitive Dust Control	D	06/24/09	N/A
58	Incinerator Burning	F	01/17/73†	05/11/77
59	Control of Waste Disposal - Site Emissions	D	11/03/87	N/A
59.1	Municipal Solid Waste Landfills	D	06/17/98	N/A
60	Circumvention	F	05/17/94	03/09/00
60.1	Limiting Potential to Emit – Small Sources	D	04/04/12	N/A
60.2	Limiting Potential to Emit - Synthetic Minor Sources	D	04/04/12	N/A
61.0	Definitions Pertaining to the Storage & Handling of Organic Compounds	F	10/16/90	09/13/93
		•	•	i .

61.2	Transfer of Volatile Organic Compounds into Mobile Transport Tanks	F	02/10/21	12/16/22
61.3	Transfer of Volatile Organic Compounds into Stationary Storage Tanks	F	10/16/90	06/30/93
61.3.1	Transfer of Gasoline into Stationary Underground Storage Tanks	D	03/01/06	09/03/21
61.4	Transfer of Volatile Organic Compounds into Vehicle Fuel Tanks	F	10/16/90	05/13/93
61.4	Transfer of Volatile Organic Compounds into Vehicle Fuel Tanks	F	03/26/08	01/7/13
61.4.1	Transfer of Gasoline from Stationary Underground Storage Tanks into Vehicles Fuel Tanks	D	03/01/06	N/A
61.5	Visible Emission Standards for Vapor Control Systems	F	09/20/78†	04/14/81
61.6	NSPS Requirements for Storage of Volatile Organic Compounds	D	01/13/87	Withdrawn
61.7	Spillage and Leakage of Volatile Organic Compounds	F	01/13/87	03/11/98
61.8	Certification Requirements for Vapor Control Equipment	F	01/13/87	03/11/98
62	Sulfur Content of Fuels	F	10/21/81	07/06/82
62.1††	NSPS Requirements for Sulfur Content of Fuels	D	11/08/76	N/A
64	Reduction of Animal Matter	F	08/21/81	07/06/82
66.1	Miscellaneous Surface Coating Operations and Other	F	2/24/10	08/09/12
	Processes Emitting VOCs	D	5/11/16	?
67.0.1	Architectural Coatings	F	02/10/21	12/14/22
67.1	Alternative Emission Control Plans	F	05/15/96	03/27/97
67.2	Dry Cleaning Equipment Using Petroleum - Based Solvent	F	05/15/96	03/27/97
67.3	Metal Parts and Products Coating Operations	F	04/09/03	11/14/03
67.4	Metal Container, Metal Closure and Metal Coil Coating Operations	F	11/09/11	09/20/12
67.5	Paper, Film and Fabric Coating Operations	F	05/15/96	03/27/97
67.6.1	Cold Solvent Cleaning and Stripping Operations	F	02/10/21	10/22/21
67.6.2	Vapor Degreasing Operations	F	02/10/21	10/22/21
67.7	Cutback and Emulsified Asphalts	F	05/15/96	03/27/97
67.9	Aerospace Coating Operations	F	04/30/97	08/17/98
67.10	Kelp Processing and Bio-Polymer Manufacturing	F	06/25/97	06/22/98
67.11	Wood Parts and Products Coating Operations	F	06/27/12	04/11/13
67.12.1	Polyester Resin Operations	F	05/11/16	04/02/18
67.15	Pharmaceutical and Cosmetic Manufacturing Operations	F	05/15/96	03/27/97
67.16	Graphic Arts Operations	F	05/09/12	09/20/12
67.17	Storage of Materials Containing Volatile Organic Compounds	F	05/15/96	03/27/97
67.18	Marine Coating Operations	F	05/15/96	03/27/97
67.19	Coating and Printing Inks Manufacturing Operations	F	05/15/96	05/26/00
67.20.1	Motor Vehicle and Mobile Equipment Coating Operations	D	06/30/10	N/A
67.21	Adhesive Material Application Operations	D	11/14/08	N/A
67.22	Expandable Polystyrene Foam Products Manufacturing Operations	D	05/15/96	N/A

67.24	Bakery Ovens	F	05/15/96	03/27/97
68	Fuel-Burning Equipment – Oxides of Nitrogen	F	09/20/94	04/09/96
68.1††	NSPS Requirements for Oxides of Nitrogen from Fuel- Burning Equipment	D	11/08/76	N/A
69	Electrical Generating Steam Boilers, Replacement Units & New Units	D	12/12/95	N/A
69.2	Industrial & Commercial Boilers, Process Heaters & Steam Generators	F	09/27/94	02/09/96
69.2.1	Small Boilers, Process Heaters and Steam Generators	D/F	07/08/20	Pending
69.2.2	Medium Boilers, Process Heaters and Steam Generators	F	09/09/21	8/23/23
69.3**	Stationary Gas Turbine Engines	F	Repealed	06/17/97 (Withdrawal Pending)
69.3.1**	Stationary Gas Turbine Engines – BARCT	D	12/9/21	Pending
69.4**	Stationary Internal Combustion Engines	F	Repealed	01/04/06 (Withdrawal Pending)
69.4.1**	Stationary Internal Combustion Engines - BARCT	D	07/08/20	Pending
69.5.1	Natural Gas-Fired Water Heaters	D	06/24/15	N/A
69.6	Natural Gas-Fired Fan-Type Central Furnaces	D	06/17/98	N/A
69.7	Landfill Gas Flares	D/F	03/09/23	Pending
70	Orchard Heaters	F	01/17/72	09/22/72
71	Abrasive Blasting	F	03/30/77	08/31/78
	REGULATION V - PROCEDURES BEFORE THE HEARING BOARD			
75	Procedure Before the Hearing Board	D	09/17/85	N/A
75.1††	NSPS & NESHAPS Variance Procedures	D	09/17/85	N/A
97	Emergency Variance	D	07/25/95	N/A
98	Breakdown Conditions: Emergency Variance	D	07/25/95	N/A
	REGULATION VI - BURNING CONTROL			
101	Burning Control	F	09/25/02	04/30/03
	REGULATION VII - VALIDITY AND EFFECTIVE DATE			
140	Validity	F	01/01/69†	09/22/72
140			0 1/ 0 1/ 0/	
141	Effective Date	F	01/01/69†	09/22/72
	REGULATION VIII - SAN DIEGO AIR POLLUTION EMERGENCY PLAN	F	01/01/69†	09/22/72
	REGULATION VIII - SAN DIEGO	F	01/01/69†	09/22/72
141	REGULATION VIII - SAN DIEGO AIR POLLUTION EMERGENCY PLAN			
141	REGULATION VIII - SAN DIEGO AIR POLLUTION EMERGENCY PLAN Applicability	F	05/25/77	08/31/78
141 126 127	REGULATION VIII - SAN DIEGO AIR POLLUTION EMERGENCY PLAN Applicability Episode Criteria Levels	F F	05/25/77 09/17/91	08/31/78 03/18/99
141 126 127 128	REGULATION VIII - SAN DIEGO AIR POLLUTION EMERGENCY PLAN Applicability Episode Criteria Levels Episode Declaration	F F F	05/25/77 09/17/91 09/17/91	08/31/78 03/18/99 03/18/99

132	Traffic Abatement Plan	F	05/01/81	06/21/82
		D	12/17/97	N/A
133	Schools	F	05/25/77	08/31/78
134	Source Inspection	F	04/01/81	06/21/82
135	Air Monitoring Stations	F	05/25/77	08/31/78
136	Interdistrict and Interbasin Coordination	F	05/25/77	08/31/78
137	Emergency Action Committee	F	05/25/77	08/31/78
138	Procedures and Plans	F	05/25/77	08/31/78
	APPENDIX A - Persons to be Notified on Episode Declaration	F		
	REGULATION IX - PUBLIC RECORDS			
175	General	F	05/22/74†	05/11/77
176	Information Supplied to District	F	05/22/74	05/11/77
177	Inspection of Public Records	F	03/30/77	08/31/78
		D	06/20/01	N/A
	REGULATION XII - TOXIC AIR CONTAMINANTS	-		
1200	Toxic Air Contaminants - New Source Review	D	09/19/23	N/A
1202	Hexavalent Chromium - Cooling Towers	D	07/25/95	N/A
1203	Ethylene Oxide Sterilizers and Aerators	D	07/26/00	N/A
1205	Control of Dioxins Emissions from Medical Waste Incinerators	D	01/01/94	N/A
1206	Asbestos Removal, Renovation, and Demolition	D	11/15/17	N/A
1210	Toxic Air Contaminant Public Health Risks - Public Notification and Risk Reduction	D	09/19/23	N/A

	REGULATION XIV -			
1401	TITLE V OPERATING PERMITS General Provisions	F	10/14/21	02/27/0
1410	Permit Required	F	02/27/04	02/27/0
1411	Exemption from Permit to Operate for Insignificant Units	F	03/07/95	11/30/0
1412	Federal Acid Rain Program Requirements	F	01/18/94	11/30/0
1413	Early Reduction of Hazardous Air Pollutants	F	03/07/95	11/30/0
1414	Applications	F	03/07/95	11/30/0
1415	Permit Process-Public Notification	F	02/27/04	02/27/0
		D	10/12/23	Pendin
1417	Pendency & Cancellation of Applications	F	03/07/95	11/30/0
1418	Action on Applications	F	02/27/04	11/30/0
1419	Provisions of Sampling & Testing Facilities & Emission Information	F	03/07/95	11/30/0
1420	Standards for Granting Permits	F	03/07/95	11/30/0
1421	Permit Conditions	F	02/27/04	02/27/0
1422	Denial or Cancellation Of Applications	F	03/07/95	11/30/0
1423	Further Information	F	01/18/94	11/30/0
1424	Applications Deemed Denied	F	01/18/94	11/30/0
1425	Appeals & Judicial Review	F	02/27/04	02/27/0
	APPENDIX A - Insignificant Units	F	02/27/04	11/30/0
	REGULATION XV - FEDERAL CONFORMITY			
1501	Conformity of General Federal Actions	F	06/22/99	04/23/9

The following NSPS and NESHAP have been adopted locally by the District. EPA has granted the District delegation for each of these rules. Therefore, these rules, as adopted by the District are the federally applicable requirements. In addition, if an NSPS or NESHAP is revised by EPA and the revised rule not adopted by the District, both versions of the rule are considered federally applicable requirements and the most stringent requirement applies until such time as the District adopts the revised version.

Subpart &	adopts the revised version.	District	Federal
Citation		Adoption	Delegation
	RULE TITLE	Date(s)	Date
D 4.60	Draw work V. Court and on Draw on New York		A 1
Part 60	REGULATION X - STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES	04/06/2021	As shown below
Λ	General Provisions	04/06/2021	04/08/2021
A D	Standards of Performance for Electric Utility Steam Generating Units	01/29/2020	04/08/2021
D	for Which Construction is Commenced After September 18, 1978	01/2//2020	04/00/2021
Da	Standards of Performance for Industrial-Commercial -Institutional	01/29/2020	04/08/2021
	Steam Generating Units		
Db	Standards of Performance for Small Industrial-Commercial -	01/29/2020	04/08/2021
	Institutional Steam Generating Units		
Dc	Standards of Performance for Electric Utility Steam Generating Units	01/29/2020	04/08/2021
	for Which Construction is Commenced After September 18, 1978	01/00/0000	0.4/00/2021
E	Standards of Performance for Incinerators Standards of Performance for Large Municipal Waste Combustors for	01/29/2020	04/08/2021 01/03/2008
Eb	Which Construction is Commenced After September 20, 1994 or for	06/20/2007	01/03/2008
	Which Modification Or Reconstruction Commenced After June 19,		
	1996		
Ec	Standards of Performance for Hospital/Medical/Infectious Waste	01/29/2020	04/08/2021
	Incinerators		
I	Standards of Performance for Hot Mix Asphalt Facilities	01/29/2020	04/08/2021
J	Standards of Performance for Petroleum Refineries	01/29/2020	04/08/2021
K	Standards of Performance for Storage Vessels for Petroleum Liquids	06/20/2007	01/03/2008
	Construct After June 11, 1973 and Prior to May 19, 1978		
Ka	Standards of Performance for Storage Vessels for Petroleum Liquids	06/20/2007	01/03/2008
171.	Construction after May 18, 1978	06/20/2007	01/02/2009
Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels Petroleum Liquid Storage Vessels) for Which Construction,	06/20/2007	01/03/2008
	Reconstruction, or Modification Commenced after July 23, 1984		
L	Standards of Performance for Secondary Lead Smelters	01/29/2020	04/08/2021
M	Standards of Performance for Secondary Brass and Bronze Ingot	01/29/2020	04/08/2021
	Production Plants	0 - 7 - 7 7 - 0 - 0	0 11 0 01 = 0 = 0
О	Standards of Performance for Sewage Treatment Plants	01/29/2020	04/08/2021
DD	Standards of Performance for Grain Elevators	01/29/2020	04/08/2021
EE	Standards of Performance for Surface Coating Metal Furniture	01/29/2020	04/08/2021
GG	Standards of Performance for Stationary Gas Turbines	01/29/2020	04/08/2021
QQ	Standards of Performance for the Graphic Arts Industry: Publication	01/29/2020	04/08/2021
	Rotogravure Printing		
RR	Standards of Performance for Pressure Sensitive Tape and Label	01/29/2020	04/08/2021
CC	Surface Coating Operations	01/20/2020	04/09/2021
SS	Standards of Performance for the Industrial Surface Coating Large Appliances	01/29/2020	04/08/2021
TT	Standards of Performance for Metal Coil Surface Coating	01/29/2020	04/08/2021
AAA	Standards of Performance for New Residential Wood Heaters	04/06/2021	04/08/2021
BBB	Standards of Performance for the Rubber Tire Manufacturing Industry	01/29/2020	04/08/2021

FFF	Standards of Performance for Flexible Vinyl and Urethane Coating and Printing	01/29/2020	04/08/2021
JJJ	Standards of Performance for Petroleum Dry Cleaners	01/29/2020	04/08/2021
000	Standards of Performance for Nonmetallic Mineral Processing Plants	01/29/2020	04/08/2021
UUU	Standards of Performance for Calciners and Dryers in Mineral Industries	01/29/2020	04/08/2021
VVV	Standards for Polymeric Coating of Supporting Substrates Facilities	05/23/2007	01/03/2008
WWW	Standards of Performance for Municipal Solid Waste Landfills	04/06/2021	04/08/2021
AAAA	Standards of Performance for Small Municipal Waste Combustion Units	06/20/2007	01/03/2008
CCCC	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units	04/06/2021	04/08/2021
EEEE	Standards of Performance for Other Solid Waste Incineration Units	01/29/2020	04/08/2021
IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	04/06/2021	04/08/2021
JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	04/06/2021	04/08/2021
KKKK	Standards of Performance for Stationary Combustion Turbines	04/06/2021	04/08/2021
QQQQ	Standards of Performance for New Residential Hydronic Heaters and Forced-Air Furnaces	04/06/2021	04/08/2021
TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	04/06/2021	04/08/2021
Part 61	REGULATION XI- NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS)		
A	General Provisions	01/13/87	05/24/82
C	National Emission Standard for Beryllium	Unknown	11/08/76
D	National Emission Standard for Beryllium Rocket Motor Firing	Unknown	11/08/76
Е	National Emission Standard for Mercury	03/27/90	05/17/91
F	National Emission Standard for Vinyl Chloride	08/17/77 06/16/78	11/21/77

The following ATCM and NESHAP have not been adopted by the District, but are being implemented and enforced by the District as ATCM's.

Subpart & Citation	RULE TITLE
	DISTRICT RULES AND REGULATIONS APPENDIX A - CALIFORNIA AIRBORNE TOXIC CONTROL MEASURES (ATCM)
17 CCR	Hexavalent Chromium ATCM for Chrome Plating & Chromic Acid Anodizing Operations
§ 93102	
17 CCR	ATCM For Emissions of Perchloroethylene From Dry Cleaning Operations
§ 93109	
17 CCR § 93101.5	ATCM to Reduce Emissions of Hexavalent Chromium and Nickel from Thermal Spraying
17 CCR	ATCM for Construction, Grading, Quarrying, and Surface Mining Operations
§ 93105	ATEM for Construction, Grading, Quarrying, and Surface Mining Operations
17 CCR	Asbestos ATCM for Surface Applications
§ 93106	The color of the c
17 CCR	ATCM For Emissions of Toxic Metals From Non-Ferrous Metal Melting
§ 93107	6
17 CCR	ATCM for Emissions of Chlorinated Toxic Air Contaminants from Automotive
§ 93111	Maintenance & Repair Activities
17 CCR	ATCM for Emissions of Hexavalent Chromium and Cadmium from Motor Vehicle and
§ 93112	Motor Equipment Coatings
17 CCR	ATCM to Reduce Emissions of Toxic Air Contaminants from Outdoor Residential Waste
§ 93113	Burning
17 CCR	ATCM for Stationary Compression Ignition Engines
§ 93115	
17 CCR	ATCM for Portable Diesel-Fueled Engines
§ 93116	
Part 63	DISTRICT RULES AND REGULATIONS APPENDIX B - NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP) FOR SOURCE CATEGORIES
A	General Provisions
N	Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks
0	Ethylene Oxide Sterilization Facilities
R	Gasoline Distribution
T	Halogenated Solvent Cleaning
DD	Off-site Waste & Recovery Operations
GG	Aerospace Manufacturing and Rework Facilities
II	Shipbuilding and Ship Repair (Surface Coating)
JJ	Wood Furniture Manufacturing Operations
VVV	Publicly Owned Treatment Works
AAAA	Municipal Solid Waste Landfills
EEEE	Organic Liquids Distribution (non-gasoline)
MMMM	Surface Coating of Miscellaneous Metal Parts and Products
PPPP	Plastic Parts (surface coating)
SSSS	Surface Coating of Metal Coil
VVVV	Boat Manufacturing
WWWW	Reinforced Plastic Composites Production
YYYY	Stationary Combustion Turbines
ZZZZ	Stationary Reciprocating Internal Combustion Engines Industrial, Commercial, and Institutional Boilers and Process Heaters
DDDDD	

GGGGG	Site Remediation
ННННН	Miscellaneous Coating Manufacturing
PPPPP	Engine Test Cells/Stands
WWWWW	Hospital Ethylene Oxide Sterilizers Area Sources
BBBBBB	Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
CCCCCC	Gasoline Dispensing Facilities
НННННН	Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources
JJJJJJ	Area Sources: Industrial, Commercial, and Institutional Boilers
QQQQQQ	Wood Preserving Area Sources
VVVVV	Chemical Manufacturing Area Sources
WWWWWW	Plating and Polishing Operations Area Sources
XXXXXX	Metal Fabrication and Finishing Area Sources
AAAAAA	Asphalt Processing and Asphalt Roofing Manufacturing Area Sources
CCCCCCC	Paint and Allied Products Manufacture Area Sources

- 1. Rule Citations marked with an "††" contain no substantive requirements and are listed for informational purposes only.
- 2. 'A/R' Denotes enforceability of the listed applicable requirement as follows:
 - 'F' Denotes a Federal applicable requirement that is federally enforceable and District enforceable.
 - 'D/F' Denotes a District applicable requirement which is pending SIP approval. For some rules, there are separate versions denoted as "F" and "D" which indicates when there is a SIP version of the rule, denoted by "F", which is federally enforceable, and an amended version of the rule which has been approved by the District but has not been approved into the SIP. At the time a pending rule is approved into the SIP, it will become fully federally enforceable and replace the previous version of the rule.
 - 'D' Denotes a District only applicable requirement. This may include some state requirements that are enforceable by the District.
- 3. District adoption dates marked with an "†" are the effective date of the rule, the actual adoption date is uncertain.
- 4. For rules 20.2-20.4 as marked with a "*", certain provisions were not submitted to EPA as denoted in the SIP submittals, and these provisions are therefore not federally enforceable
- 5. Rules 69.3 and 69.4 were repealed by the District because the applicable provisions were incorporated into Rules 69.3.1 and 69.4.1 which were submitted to EPA for SIP approval. However, these rules have not been approved due to concerns with startup/shutdown exemptions from emission limits.

APPENDIX C: ABBREVIATIONS THAT MAY APPEAR IN THIS PERMIT

APCO Air Pollution Control Officer

ASTM American Society for Testing and Methods

BACT Best Available Control Technology

CAA federal Clean Air Act

CFR Code of Federal Regulations

CO Carbon Monoxide CO₂ Carbon Dioxide

District San Diego County Air Pollution Control District

EF Emission Factor

EPA US Environmental Protection Agency

HAP Hazardous Air Pollutant
I&M Inspection and Maintenance

NESHAP National Emission Standard for Hazardous Air Pollutants

NSPS New Source Performance Standards

NSR New Source Review

[NSR] New Source Review based condition

NO_x Oxides of nitrogen

O₂ Oxygen

OES Office of Environmental Services
O&M Operation and maintenance

Pb Lead

PM Total Particulate Matter

PM₁₀ Particulate matter with aerodynamic equivalent diameter of \leq 10 microns

PSD Prevention of Significant Deterioration

RMP Risk Management Plan

SDCAPCD San Diego County Air Pollution Control District

SIP State Implementation Plan

SO_x Oxides of sulfur

Title IV Title IV of the federal Clean Air Act
Title V Title V of the federal Clean Air Act

VOC Volatile organic compound

Units of Measure:

dscf = Dry standard cubic foot

g = grams gal = gallon

gr/dscf = Grains per dry standard cubic foot

hr = hour
lb = pound
in = inches
max = maximum
min = minute

MM Btu = Million British thermal units psia = pounds per square inch, absolute

scf = Standard cubic foot

scfm = standard cubic feet per minute

yr = year