

September 20, 2023

Mr. David Parker
Prison Industry Authority - Avenal
#1 Kings Way/P.O. Box 8
Avenal, CA 93204

Re: Notice of Final Action - Title V Permit Renewal
Facility Number: C-954
Project Number: C-1220506

Dear Mr. Parker:

The District has issued the Final Renewed Title V Permit for Prison Industry Authority - Avenal (see enclosure). The preliminary decision for this project was made on July 24, 2023. No comments were received following the District's preliminary decision on this project.

The public notice for issuance of the Final Title V Permit will be posted on the District's website (www.valleyair.org).

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Sincerely,



Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Gerardo Rios, EPA (w/enclosure) via EPS

Samir Sheikh
Executive Director/Air Pollution Control Officer

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**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation
Prison Industry Authority - AVENAL
C954**

TABLE OF CONTENTS

I.	PROPOSAL.....	2
II.	FACILITY LOCATION	2
III.	EQUIPMENT LISTING	3
IV.	GENERAL PERMIT TEMPLATE USAGE	3
V.	SCOPE OF EPA AND PUBLIC REVIEW	3
VI.	FEDERALLY ENFORCEABLE REQUIREMENTS	3
VII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE.....	5
VIII.	PERMIT REQUIREMENTS	6
IX.	PERMIT SHIELD.....	14
X.	CALIFORNIA ENVIRONMENTAL QUALITY ACT	14
XI.	PERMIT CONDITIONS	14
ATTACHMENTS		15
A.	DRAFT RENEWED TITLE V OPERATING PERMIT	
B.	PREVIOUS TITLE V OPERATING PERMIT	
C.	DETAILED SUMMARY LIST OF FACILITY PERMITS	

TITLE V PERMIT RENEWAL EVALUATION

Correctional Institution

Engineer: Marisol Miranda
Date: July 7, 2023

Facility Number: C-954
Facility Name: Prison Industry Authority - AVENAL
Mailing Address: #1 Kings Way/P.O. Box 8
Avenal, CA 93204

Contact Name: David Parker
Phone: (916) 365-6935

Responsible Official: David Parker
Title: Prison Industry Administrator

Project # : C-1220506
Deemed Complete: May 10, 2022

I. PROPOSAL

Prison Industry Authority - Avenal was issued a Title V permit on April 1, 2007. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the previous Title V permit renewal dated August 22, 2017.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Prison Industry Authority – Avenal is located at #1 Kings Way in Avenal, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2201, New and Modified Stationary Source Review Rule (amended August 15, 2019)
- District Rule 2520, Federally Mandated Operating Permits (amended August 15, 2019)
- District Rule 4601, Architectural Coatings (amended April 16, 2020)
- 40 CFR Part 64, Compliance Assurance Monitoring
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners (amended March 24, 2021)
- 40 CFR Part 82, Subpart F, Recycling and Emission Reduction (amended April 10, 2020)

B. Rules Removed

- Kings County Rule 111, Equipment Breakdown (Rescinded from SIP February 17, 2022)

C. Rules Added

There are no rules that have been added since the last Title V renewal.

D. Rules Not Updated

- District Rule 1070, Inspections (December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1160, Emission Statements (amended November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended December 18, 2014)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2410, Prevention of Significant Deterioration (amended November 26, 2012)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4603, Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (amended September 17, 2009)
- District Rule 4606, Wood Products and Flat Wood Paneling Products Coating Operations (amended October 16, 2008)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)

- District Rule 8011, Fugitive Dust General Requirements (amended August 19, 2004)
- District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Construction, Demolition, Excavation, and Extraction Activities (amended August 19, 2004)
- District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Handling and Storage of Bulk Materials (amended August 19, 2004)
- District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Carryout and Trackout (amended August 19, 2004)
- District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Open Area (amended August 19, 2004)
- District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Paved and Unpaved Roads (amended August 19, 2004)
- District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Unpaved Vehicle/Equipment Areas (amended September 16, 2004)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (amended July 20, 2004)

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Added/Updated

There are no rules that have been added since the last Title V renewal.

B. Rules Not Updated

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 4102, Nuisance (amended December 17, 1992)

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit.

A. Kings County Rule 111 – Equipment Breakdown

In accordance with EPA's State Implementation Plan (SIP) Call, on February 17, 2022, the District rescinded Fresno County Rule 110 (Equipment Breakdown), Kern County Rule 111 (Equipment Breakdown), Kings County Rule 111 (Equipment Breakdown), Madera County Rule 113 (Equipment Breakdown), Stanislaus County Rule 110 (Equipment Breakdown), and Tulare County Rule 111 (Equipment Breakdown) from the State Implementation Plan.

Conditions #2, #3, and #40 of permit C-954-0-4 are modified to remove the references that no longer apply. Additionally, conditions #2 and #3 have been updated to not be federally enforceable, since District Rule 1100 and Kings County Rule 111 are not in the SIP.

B. District Rule 2201 - New and Modified Stationary Source Review Rule (NSR)

This rule has been amended since this facility's Title V permit was last renewed. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit.

C. District Rule 2520 - Federally Mandated Operating Permits

This rule has been amended since this facility's previous Title V permit was issued. The amendments enhanced the public notice process by making

public notice information available on the District's website 24 hours/day, 7 days/week, in both Spanish and English. This rule amendment did not require any changes to existing permit conditions. Thus, continued compliance is expected.

D. District Rule 4601 – Architectural Coatings

District Rule 4601 has been amended since this facility's Title V permit was last renewed. This rule limits the emissions of Volatile Organic Compounds (VOC) from architectural coatings. The VOC content limits for coatings and colorants are listed in Tables 1 and 2, respectively, of Section 5.0. This rule specifies architectural coating storage, cleanup, and labeling requirements.

The following changes were included in the latest rule amendment that resulted in revising current permit requirements:

-Table of Standards 1 (through 12/31/2010) and Table of Standards 2 (after 1/1/2011) specifying the VOC content limits of different coatings and colorants have been replaced with Table 1 and Table 2 (effective after 1/1/2022 in Section 5.0)

To ensure compliance with Rule 4601 as amended on April 16, 2020, conditions #24, #25, and #26 of the facility-wide requirements permit C-954-0-3 will be replaced with conditions #24, #25, and #26 on the draft facility-wide permit C-954-0-4.

- No person shall manufacture, blend, repackage, supply, market, sell, solicit or apply any architectural coating or colorant with a VOC content in excess of the applicable limits specified in Table 1 (Coatings) and Table 2 (Colorants) of District Rule 4601 (4/16/20), unless exempted under Section 4.0 of District Rule 4601 (4/16/20). [District Rule 4601]
- All VOC-containing materials subject to Rule 4601 (4/16/20) shall be stored in closed containers when not in use. [District Rule 4601]
- The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 Sections 6.1 and 6.3 (4/16/20). [District Rule 4601]

Compliance with the amended rule is expected

E. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

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

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

Pollutant	Major Source Threshold (lb/year)
NO _x	20,000
SO _x	140,000
PM ₁₀	140,000
CO	200,000
VOC	20,000

C-954-1-10: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

NO_x, SO_x, and CO:

This permit unit does not have an emission limit for NO_x, SO_x, and CO. Therefore, CAM is not required for these pollutants.

VOC:

This permit unit contains an emission limit for VOC. However, this unit is not equipped with an add-on control device to reduce VOC emissions. Therefore, CAM is not required.

PM10:

This permit unit has an emission limit for PM10 and does have a paint booth with exhaust filters reduce PM10 emissions.

The combined PM10 emission limit for units C-954-1, -2, and -14 is 9.1 lb-PM10/week. As worst case scenario, it is assumed that this unit will emit 9.1 lb-PM10/week for 52 weeks/year. The exhaust filters have a control efficiency of 95% based on a March 26, 2006 Memorandum to EPA, (Review of Spray Booth Filter Information for the Area Source Motor Vehicle).

$$\begin{aligned} \text{PE (uncontrolled)} &= 9.1 \text{ lb-PM}_{10}/\text{week} \times (1 / (1-0.95)) \times 52 \text{ weeks/yr} \\ &= 9,464 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the uncontrolled emissions are less than the major source threshold of 140,000 lb/year of PM₁₀ emissions, CAM is not required for this unit.

C-954-2-10: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

NO_x, SO_x, and CO:

The permit unit does not have emission limits for NO_x, SO_x, and CO. Therefore, CAM is not required for these pollutants.

VOC:

This permit unit contains an emission limit for VOC. However, this unit is not equipped with an add-on control device to reduce VOC emissions. Therefore, CAM is not required.

PM₁₀:

This permit unit has an emission limit for PM₁₀ and is served by a paint booth with exhaust filters to reduce PM₁₀ emissions.

The combined PM₁₀ emission limit for units C-954-1, -2, and -14 is 9.1 lb-PM₁₀/week. As worst case scenario, it is assumed that this unit will emit 9.1 lb-PM₁₀/week for 52 weeks/year. The exhaust filters have a control efficiency of 95% based on a March 26, 2006 Memorandum to EPA, (Review of Spray Booth Filter Information for the Area Source Motor Vehicle).

$$\begin{aligned} \text{PE (uncontrolled)} &= 9.1 \text{ lb-PM}_{10}/\text{week} \times (1 / (1-0.95)) \times 52 \text{ weeks/yr} \\ &= 9,464 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the uncontrolled emissions are less than the major source threshold of 140,000 lb/year of PM₁₀ emissions, CAM is not required for this unit.

C-954-3-14: WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 2 CHOP SAWS, 1 BAND SAW, 1 PANEL SAW, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 2 EDGE BANDERS, 5 CNC

ROUTERS, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENT
ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE
DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM AND
A HEATED PANEL EXPRESS GLUE PRESS SYSTEM

NO_x, SO_x, and CO:

This permit unit does not have emission limits for NO_x, SO_x, and CO. Therefore, CAM is not required for these pollutants.

VOC:

This permit unit contains an emission limit for VOC. However, this unit is not equipped with an add-on control device to reduce VOC emissions. Therefore, CAM is not required.

PM₁₀:

This permit unit has an emission limit for PM₁₀ and is served by a baghouse to reduce PM₁₀ emissions.

The PM₁₀ emission limit for this unit is 1.1 lb-PM₁₀/day. The baghouse has a control efficiency of 99%.

$$\begin{aligned} \text{PE (uncontrolled)} &= 1.1 \text{ lb-PM}_{10}/\text{day} \times (1 / (1-0.99)) \times 365 \text{ days/year} \\ &= 40,150 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the uncontrolled emissions are less than the major source threshold of 140,000 lb/year of PM₁₀ emissions, CAM is not required for this unit.

C-954-4-9: POWDER COATING OPERATION CONSISTING OF POWDER
COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE
OVEN, AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH
INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING

NO_x, SO_x, CO, and VOC:

This permit unit has emission limits for NO_x, SO_x, CO, and VOC but it is not equipped with an add-on control device for these pollutants. Therefore, CAM is not required for NO_x, SO_x, CO, and VOC.

PM10:

This permit unit has an emission limit for PM10 and is served by a coating booth to reduce PM10 emissions.

This permit unit is limited to 600 lb-powder/day. It is assumed that 100% of the powder coating is PM10. The electrostatic spray gun transfer efficiency is 75% (STAPPA/ALAPCO Vol. 2).

Uncontrolled emissions without the use of a powder coating booth are calculated as follows:

$$\begin{aligned} \text{PE (uncontrolled)} &= 600 \text{ lb-powder/day} \times 365 \text{ days/year} \times (1-0.75) \times (1 \text{ lb-PM10/} \\ &\quad \text{1 lb-powder)} \\ &= 54,750 \text{ lb-PM10/year} \end{aligned}$$

Since the uncontrolled emissions are less than the major source threshold of 140,000 lb/year of PM10 emissions, CAM is not required for this unit.

C-954-10-5: POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND A 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN

NOx:

This permit unit contains an emission limit for NOx. However, this unit is not equipped with an add-on control device to reduce NOx emissions. Therefore, CAM is not required for NOx.

SOx, CO, and VOC:

This permit unit does not have emission limits for SOx, CO, and VOC. Therefore, CAM is not required for these pollutants.

PM10:

This unit contains an emission limit for PM10 and is served by a powder coating booth.

This permit unit is limited to 319 lb-powder/day. It is assumed that 100% of the powder coating is PM10. The electrostatic spray gun transfer efficiency is 75% (STAPPA/ALAPCO Vol. 2).

PE (uncontrolled) = 319 lb-powder/day x 365 days/year x (1-0.75) x (1 lb-PM10/ 1 lb-powder)
= 29,109 lb-PM10/year

Since the uncontrolled emissions are less than the major source threshold of 140,000 lb/year of PM10 emissions, CAM is not required for this unit.

C-954-14-6: CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AND WOODWORKING OPERATION INCLUDING: A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANThERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT, AND A PERMIT EXEMPT BOILER (NATURAL GAS-FIRED, 5 MMBTU/HR OR LESS)

NO_x, SO_x, and CO:

This permit unit does not have emission limits for NO_x, SO_x, and CO. Therefore, CAM is not required for these pollutants.

VOC:

This permit unit contains an emission limit for VOC. However, this unit is not equipped with an add-on control device to reduce VOC emissions. Therefore, CAM is not triggered for VOC emissions.

PM10:

This permit unit has an emission limit for PM10 and is served by a paint booth with exhaust filters to reduce PM10 emissions.

The combined PM10 emission limit for units C-954-1, -2, and -14 is 9.1 lb-PM10/week. As worst case scenario, it is assumed that this unit will emit 9.1 lb-PM10/week for 52 weeks/year. The exhaust filters have a control efficiency of 95% based on a March 26, 2006 Memorandum to EPA, (Review of Spray Booth Filter Information for the Area Source Motor Vehicle).

$$\begin{aligned} \text{PE (uncontrolled)} &= 9.1 \text{ lb-PM}_{10}/\text{week} \times (1 / (1-0.95)) \times 52 \text{ weeks/yr} \\ &= 9,464 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Since the uncontrolled emissions are less than the major source threshold of 140,000 lb/year of PM₁₀ emissions, CAM is not required for this unit.

F. 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners

The purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Act regarding certain servicing, maintenance, repair, and disposal of air conditioners in MVACs and MVAC-like appliances.

These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this subpart do not result in a modification to the current permit requirement included as condition 29 on the draft facility-wide permit C-954-0-4. Therefore, the modifications to this subpart are not addressed any further in this evaluation.

G. 40 CFR Part 82, Subpart F – Recycling and Emission Reduction

The purpose of this subpart is to reduce emissions of class I and class II refrigerants and their non-exempt substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the maintenance, service, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I or class II ozone-depleting substance or their non-exempt substitutes in accordance with Title VI of the Clean Air Act.

This subpart applies to any person maintaining, servicing, or repairing appliances containing class I, class II or non-exempt substitute refrigerants. This subpart also applies to persons disposing of such appliances (including small appliances and motor vehicle air conditioners), refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recovery and/or recycling

equipment, approved recovery and/or recycling equipment testing organizations, and persons buying, selling, or offering to sell class I, class II, or non-exempt substitute refrigerants.

The amendments to this subpart do not result in a modification to the current permit requirement included as condition 28 of the draft facility-wide permit C-954-0-4. Therefore, the modifications to this subpart are not addressed any further in this evaluation.

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant does not propose to use any model general permit templates.

X. California Environmental Quality Act

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility nor will the Title V permit renewal authorize a physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

XI. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Summary List of Facility Permits

ATTACHMENT A

Draft Renewed Title V Operating Permit

ATTACHMENT B

Previous Title V Operating Permit

ATTACHMENT C

Detailed Summary List of Facility Permits
