



October 10, 2023

Chris Seney
Forward, Inc. Composting Facility
9999 S Austin Rd
Manteca, CA 95336

RE: Notice of Final Action - Authority to Construct
Facility Number: N-8534
Project Number: N-1212824

Dear Mr. Seney:

The Air Pollution Control Officer has issued the Authority to Construct permits to Forward, Inc. Composting Facility for a new green waste receiving, stockpiling, and composting operation utilizing a positively aerated static pile (ASP) system, at 9999 S Austin Rd, Manteca. Enclosed are the Authority to Construct permits and a copy of the notice of final action that has been posted on the District's website (www.valleyair.org).

Notice of the District's preliminary decision to issue the Authority to Construct permits was posted on August 31, 2023. The District's analysis of the proposal was also sent to CARB on August 31, 2023. No comments were received following the District's preliminary decision on this project.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Samir Sheikh

Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: (661) 392-5500 FAX: (661) 392-5585

Mr. Chris Seney
Page 2

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

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Clements", with a stylized, flowing script.

Brian Clements
Director of Permit Services

BC:jy

Enclosures

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

AUTHORITY TO CONSTRUCT

PERMIT NO: N-8534-7-0

ISSUANCE DATE: 10/10/2023

LEGAL OWNER OR OPERATOR: FORWARD, INC. COMPOSTING FACILITY

MAILING ADDRESS: 1145 W CHARTER WY
STOCKTON, CA 95206

LOCATION: 9999 S AUSTIN RD
MANTECA, CA 95336

EQUIPMENT DESCRIPTION:

GREEN WASTE MATERIALS RECEIVING AND STORAGE OPERATION SERVING THE COMPOSTING OPERATION
PERMITTED UNDER N-8534-8

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Green material is defined as vegetative material generated from gardening, agriculture, or landscaping activities including, but not limited to, a mixture of grass clippings, leaves, tree and shrub trimmings, and plant remains. [District Rule 2201]
5. Wood material is defined as untreated lumber and the woody-material portion of mixed demolition wastes and mixed-construction wastes. Wood material also includes overs, and the woody material portion of trees. Wood material or wood material chips to which other organic material has been added are not considered to be wood material. [District Rule 2201]
6. Food material is defined as food scraps collected from the food processing industry, food service industry, grocery stores, or residential food scrap collection. Food material also includes food material that is chipped or ground. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

N-8534-7-0 : Oct 10 2023 9:07AM -- YOSHIMUJ : Joint Inspection NOT Required

7. Within 24 hours of the receipt of green material on site, the operator shall either (1) Remove the green material from the facility; or (2) Place the green material in an active-phase composting windrow and start active phase composting. Wood material, as defined below, is not subject to the 24 hour limitation. [District Rule 2201]
8. Within 24 hours of the receipt of food material on site, the operator shall either (1) Remove the food material from the facility; or (2) Preprocess the material for use in the composting system. [District Rule 2201]
9. The amount of green material and food material received and transferred shall not exceed either of the following limits: 7,500 tons per day or 52,000 tons per year. [District Rule 2201]
10. PM10 emissions from the receiving (truck unloading) of green, wood, and food materials shall not exceed 0.0003 lb-PM10/wet-ton of material unloaded. [District Rule 2201]
11. The amount of green and food material stored onsite shall not exceed either of the following limits: 1,700 tons per day or 52,000 tons per year. [District Rule 2201]
12. VOC emissions from the storage and processing of green material, and food material shall not exceed 0.2 lb-VOC/wet-ton/day of material stored and processed. [District Rule 2201]
13. Ammonia (NH₃) emissions from the storage and processing of green material, and food material shall not exceed 0.02 lb-NH₃/wet-ton/day of material stored and processed. [District Rule 2201]
14. For materials that will be composted, the operator shall maintain a daily record of (1) the date when the material was received; (2) the type of material (e.g. green, wood, and food) received; (3) the amount in tons received; and (4) the date when this material was moved into an active-phase composting pile and covered. [District Rule 1070]
15. A cumulative annual log shall be maintained of the total wet-tons of each material received by type. The records shall be updated at least monthly. [District Rule 1070]
16. The total quantity of organic material received at this facility for composting shall be less than 52,000 wet tons in any one calendar year. [District Rule 4566]
17. The operator shall perform one of the following to organic material within 24 days of receipt at the facility to satisfy the stockpile requirements: (a) Remove the organic material from the facility; (b) Place the organic material in the active-phase composting windrow and start active phase composting; (c) Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. [District Rule 4566]
18. A daily operations log shall be maintained and shall include the following: (a) The date, type, and weight (in wet tons) of each organic material received; (b) The date each stockpile was initially formed; (c) The date and action taken on each stockpile to satisfy the stockpile requirements; (d) Total quantity and type of each organic material stored for composting (in wet tons); (e) Total quantity and type of each organic material mixed for composing (in wet tons); (f) Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 and 4566]
19. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]
20. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041, Section 5.0. [District Rules 8011 and 8041]
21. On any unpaved road segment with 26 or more annual average daily vehicle trips (AADT), the owner/operator shall limit visible dust emissions (VDE) to 20% opacity and comply with the requirements of a stabilized unpaved road by application and/or reapplication/maintenance of at least one of the following control measures: (1) Watering; (2) Uniform layer of washed gravel; (3) Chemical/organic dust stabilizers/suppressants; (4) Roadmix; (5) Paving; or (6) Any other Any other method that can be demonstrated to the satisfaction of the APCO that effectively limits VDE to 20% opacity and meets the conditions of a stabilized unpaved road. [District Rules 8011 and 8061]
22. For unpaved vehicle or equipment traffic areas that have 50 or more annual average daily trips (AADT), or 150 or more vehicle daily trips (VDT) or 25 or more VDT with vehicles having 3 axles or more, the permittee shall apply water, washed gravel, road mix, chemical/ organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]

CONDITIONS CONTINUE ON NEXT PAGE

23. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011]
24. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4566]

AUTHORITY TO CONSTRUCT

PERMIT NO: N-8534-8-0

ISSUANCE DATE: 10/10/2023

LEGAL OWNER OR OPERATOR: FORWARD, INC. COMPOSTING FACILITY

MAILING ADDRESS: 1145 W CHARTER WY
STOCKTON, CA 95206

LOCATION: 9999 S AUSTIN RD
MANTECA, CA 95336

EQUIPMENT DESCRIPTION:

SOUTHEAST COMPOST OPERATION - ORGANIC WASTE (GREEN WASTE) COMPOSTING OPERATION WITH A POSITIVE AERATED STATIC PILE (ASP) SYSTEM WITH COVER (FABRIC OR FINISHED COMPOST) SERVING THE ACTIVE AND CURING PHASES AND PERMIT EXEMPT FINISHED COMPOST STORAGE AND LOADOUT OPERATIONS

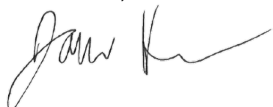
CONDITIONS

1. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 7,390 lb, 2nd quarter - 7,390 lb, 3rd quarter - 7,391 lb, and 4th quarter - 7,391 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19). [District Rule 2201]
2. ERC Certificate Number S-5300-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. All composting (active and curing phases) shall take place in a positively aerated static pile system with a cover. [District Rules 2201 and 4566]

CONDITIONS CONTINUE ON NEXT PAGE

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

Samir Sheikh, Executive Director / APCO



Brian Clements, Director of Permit Services

N-8534-8-0 : Oct 10 2023 9:08AM -- YOSHIMUJ : Joint Inspection NOT Required

7. The total daily quantity of organic materials composted shall not exceed 9,025 wet-tons in any day. [District Rules 2201, 4102, and 4566]
8. The total daily quantity of organic materials composted shall not exceed 52,000 wet-tons in any one calendar year. [District Rules 2201, 4102, and 4566]
9. The total quantity of material transferred to the active phase shall not exceed 4,700 tons per day. [District Rules 2201 and 4566]
10. The total quantity of material transferred to the curing phase shall not exceed 3,000 tons per day. [District Rules 2201 and 4566]
11. PM10 emissions from the transfer of material shall not exceed 0.0003 lb-PM10/wet-ton/transfer point. [District Rules 2201 and 4102]
12. VOC emissions from composting shall not exceed either of the following limits: 76.9 lb/day or 9,308 lb/yr. [District Rules 2201 and 4102]
13. Ammonia (NH₃) emissions from composting shall not exceed either of the following limits: 67.0 lb/day or 8,112 lb/yr. [District Rules 2201 and 4102]
14. The operator shall perform one of the following to organic material within 24 days of receipt at the facility to satisfy the stockpile requirements: (a) Remove the organic material from the facility; (b) Place the organic material in the active-phase composting windrow and start active phase composting; (c) Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. [District Rule 4566]
15. The controlled VOC emission rate from the active and curing phases combined shall not exceed 0.179 lb-VOC/wet-ton of organic materials. This controlled VOC emission rate is equivalent to a 95% or greater reduction in VOC emissions over a baseline uncontrolled windrow emission rate of 3.58 lb-VOC/wet-ton. [District Rules 2201, 4102, and 4566]
16. The controlled ammonia (NH₃) emission rate from the active and curing phases combined shall not exceed 0.156 lb-NH₃/wet-ton of organic materials. This controlled NH₃ emission rate is equivalent to an 80% or greater reduction in NH₃ emissions over a baseline uncontrolled windrow emission rate of 0.78 lb-NH₃/wet-ton. [District Rules 2201, 4102, and 4566]
17. Feedstock materials are green material, wood material, and food material or any mixture of these materials. [District Rule 2201]
18. Green material is defined as vegetative material generated from gardening, agriculture, or landscaping activities including, but not limited to, a mixture of grass clippings, leaves, tree and shrub trimmings, and plant remains. [District Rule 2201]
19. Wood material is defined as untreated lumber and the woody-material portion of mixed demolition wastes and mixed-construction wastes. Wood material also includes overs, and the woody material portion of trees. Wood material or wood material chips to which other organic material has been added are not considered to be wood material. [District Rule 2201]
20. Food material is defined as food scraps collected from the food processing industry, food service industry, grocery stores, or residential food scrap collection. Food material also includes food material that is chipped or ground. [District Rule 2201]
21. Initial source testing for VOC and NH₃ shall be performed no sooner than 90 days, but no later than 270 days after composting commences in the new +ASP bunkers used in the active and curing phases (i.e. after the first mixing of organic materials for introduction into active phase compost pile). Source testing will not be required during compost pile breakdowns and transfer of material between the active and curing phases. [District Rules 2201 and 4566]
22. Periodic source testing for VOC shall be performed at least once every 27 months. [District Rules 2201 and 4566]
23. District approved independent testing lab(s) shall perform the source testing. [District Rules 2201 and 4566]
24. The source test protocol shall be developed in accordance with the guidelines in South Coast AQMD, Rule 1133.3, Attachment A. [District Rules 2201 and 4566]

CONDITIONS CONTINUE ON NEXT PAGE

25. A daily operations log shall be maintained and shall include the following: (a) The date and time each compost pile was formed and covered with finished compost; (b) Total quantity of organic material transferred from the stockpiles to the active-phase composting windrows (in wet tons); (c) Total quantity of active-phase composting windrows (in wet tons); (d) Total quantity of curing-phase composting windrows (in wet tons); (e) Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 1070 and 4566]
26. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
27. All source testing shall take place under conditions representative of normal source operation, and, to the extent practicable, the emission measurements shall be representative of the emissions that occur over the active phase and curing phase cycles. [District Rules 2201 and 4566]
28. Source testing for the controlled VOC and NH₃ emissions shall be performed above the cover for both active phase and curing phase piles. At least two active phase piles of different ages shall be tested. One of the active phase piles selected for testing shall be representative of the day when the expected maximum VOC emission rate occurs (as indicated by temperature or other process data). At least one curing phase pile shall be tested. The age of the curing phase piles tested shall be representative of the day when the expected maximum VOC emission rate occurs. Additional piles or days may be included to ensure emission measurements are representative for the compost cycle. [District Rules 2201 and 4566]
29. The source test summary shall include the following for VOC and NH₃ emissions: (1) The controlled emission rates (lb/wet-ton) for the active phase pile; (2) The controlled emission rates (lb/wet-ton) for the curing phase pile; and (3) The total controlled emission rates (lb/wet-ton) for the active and curing phases combined. [District Rules 2201 and 4566]
30. The operator shall conduct maintenance inspections of the cover each time a cover is placed on a compost pile. Any tears or other abnormalities in the cover that could compromise the ability of the cover to act as an air pollution control device shall be repaired immediately, or the cover shall be replaced. [District Rules 2201 and 4566]
31. The operator shall conduct an inspection of the blower and air distribution system in each bunker prior to building a compost pile in that bunker. Any abnormalities that adversely affect the ability of the air distribution system to provide air to the compost pile shall be repaired prior to constructing the pile. [District Rules 2201 and 4566]
32. The operator shall maintain aerobic conditions in active phase of composting at all times. Compliance with this requirement may be demonstrated by computer records of data obtained in the controlling software that demonstrate that the blowers are operating and pushing air in a positive direction into the composting bunkers in total duration for a minimum 100 minutes of operating time in a 24-hour period each day of active phase composting. [District Rules 2201 and 4566]
33. The operator shall maintain aerobic conditions in curing phase of composting at all times. Compliance with this requirement may be demonstrated by computer records of data obtained in the controlling software that demonstrate that the blowers are operating and pushing air in a positive direction into the composting bunkers for a minimum of one (1) minute of operating time in a 24-hour period each day of curing phase composting. [District Rules 2201 and 4566]
34. At least quarterly, the operator shall demonstrate that the organic materials completing the active phase meet one of the following stability criteria: (1) The organic material respiration rate is no more than 20 milligrams of oxygen consumed per gram of volatile solids per day as measured by direct respirometry using the TMECC Method 05-08-A - SOUR: Specific Oxygen Uptake Rate; or (2) The organic material emits no more than 7 mg CO₂-C per gram of organic material per day, as measured using the TMECC Method 05-08-B - Carbon Dioxide Evolution Rate; or (3) The organic material has a Solvita® Maturity Index of 5 or greater, as measured using the TMECC Method 05-08-E - Solvita® Maturity Test. [District Rules 2201 and 4566]

35. At least quarterly, the operator shall demonstrate that the organic materials completing the curing phase meet one of the following stability criteria: (1) The organic material respiration rate is no more than 10 milligrams of oxygen consumed per gram of volatile solids per day as measured by direct respirometry using the TMECC Method 05-08-A - SOUR: Specific Oxygen Uptake Rate; or (2) The organic material emits no more than 4 mg CO₂-C per gram of organic material per day, as measured using the TMECC Method 05-08-B - Carbon Dioxide Evolution Rate; or (3) The organic material has a Solvita® Maturity Index of 7 or greater, as measured using the TMECC Method 05-08-E - Solvita® Maturity Test. [District Rules 2201 and 4566]
36. The operator shall record the cumulative wet-tons of green, wood, and food materials introduced into active phase composting during the current calendar year. [District Rules 2201 and 4566]
37. The operator shall keep a record of the wet-tons of compost material introduced into curing phase and finished phase that day and the cumulative wet-tons of compost material introduced into the curing phase and finished phase during that calendar year. [District Rules 2201 and 4566]
38. The operator shall keep a record of (1) the date each compost cover and blower are inspected; (2) the cover and blower ID number; (3) the condition of the cover and blower; and (4) a description of the repairs made, if any. [District Rules 2201 and 4566]
39. The operator shall keep a record of the compost maturity test(s) conducted on active and curing phase piles consisting of (1) the pile ID or lot number; (2) the mix ratio (by mass) of feedstock materials used; (3) the date the test was conducted; (4) the name of the test conducted; (5) the result of the compost maturity test. [District Rules 2201 and 4566]
40. All bulk material transport vehicles shall limit Visible Dust Emissions to 20% opacity by either limiting vehicular speed, maintaining sufficient freeboard on the load, applying water to the top of the load, or covering the load with a tarp or other suitable cover. [District Rules 8011 and 8031]
41. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041, Section 5.0. [District Rules 8011 and 8041]
42. On any unpaved road segment with 26 or more annual average daily vehicle trips (AADT), the owner/operator shall limit visible dust emissions (VDE) to 20% opacity and comply with the requirements of a stabilized unpaved road by application and/or reapplication/maintenance of at least one of the following control measures: (1) Watering; (2) Uniform layer of washed gravel; (3) Chemical/organic dust stabilizers/suppressants; (4) Roadmix; (5) Paving; or (6) Any other Any other method that can be demonstrated to the satisfaction of the APCO that effectively limits VDE to 20% opacity and meets the conditions of a stabilized unpaved road. [District Rules 8011 and 8061]
43. For unpaved vehicle or equipment traffic areas that have 50 or more annual average daily trips (AADT), or 150 or more vehicle daily trips (VDT) or 25 or more VDT with vehicles having 3 axles or more, the permittee shall apply water, washed gravel, road mix, chemical/ organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in District Rule 8011. [District Rules 8071 and 8011]
44. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011]
45. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4566]