



Santa Barbara County
Air Pollution Control District

Our Vision ☀ Clean Air

H.B. Case No.: 2016-44-I / 2016-48-N
Petitioner: Imerys
Permit No.: 5840
Date Rec'd: 12/13/16
Time Rec'd: 18:19
Filing Fee Paid: \$580 / \$580 \$1,160.00

PETITION FOR VARIANCE

Type of Variance Requested:

Emergency _____ Interim¹ X 90-Day X Regular _____

Length of Variance Requested: Start Date January 1/1/2017

End Date Friday 3/31/2017

¹ A 90-Day or Regular Variance must be filed concurrently with an Interim Variance

1. PETITIONER INFORMATION

A. Please provide the name, address and phone number of the Petitioner.

Name: Imerys Minerals California, Inc.
Address: 2500 Miguelito Road
Lompoc, CA 93436
Phone Number: 805-737-2440

B. Please provide the name, address and phone number of the person authorized to receive correspondence regarding this Petition if different from response in 1.A.

Name: Vindi Ndulute
Address: Imerys Minerals California, Inc.
2500 Miguelito Road
Lompoc, CA 93436
Phone Number: 805-737-2440

C. The Petitioner is (please check one):

- 1) An Individual ()
- 2) Partnership ()
- 3) Corporation (X)
- 4) Public Agency ()
- 5) Other Entity (please describe)

2. Location of equipment for which the variance is requested if different from response in 1.A.

Same as 1.A.

3. List any District permits that are applicable to the equipment subject to this variance request.

Permit to Operate 5840-R5, Conditions 9.C.7.(c).(viii) and 9.C.12.(a).(ii)

4. Briefly describe the equipment that is the subject of this Petition.

APCD Device # 108935, Baghouse 901

5. FINDINGS REQUIRED FOR THE GRANTING OF A VARIANCE

In order for the Hearing Board to grant a variance to a Petitioner authorizing the operation of a source in violation of any rule, regulation or order of the District, the Hearing Board is required to make "findings" in accordance with the requirements specified in California Health and Safety Code §42352, et. seq. and District rules and regulations. The Hearing Board's variance decision will take into consideration information you provide in this Petition. Please ensure your responses are complete and thorough. Please use additional pages as necessary.

A. Please state 1) what District rule, regulation or order you either are or will be in violation of, and 2) the date said violation will or did occur. Include as appropriate the applicable permit conditions for which variance relief is being sought.

Baghouse 901 is subject to annual source testing per PTO 5840-R5 Conditions 9.C.7.(c).(viii) and 9.C.12.(a).(ii). Source testing for 2016 was scheduled for October 25, 2016. During source test equipment setup, it was discovered that there was not sufficient airflow to conduct the source test. Imerys has identified that there is an issue with the rotor of the associated blower. Imerys has contacted the blower manufacturer and is also investigating the use of another supplier. However, the repair and testing cannot be completed before the end of the year. Imerys continues to perform the required daily monitoring for visible emissions, and there are no visible emissions present.

Imerys is in violation of the above referenced permit conditions and APCD Rule 206, Conditional Approval of Authority to Construct or Permit to Operate. Variance relief is being sought for these permit conditions.

- B. Please describe how compliance with the District rule, regulation or order listed in Section A above is beyond your reasonable control. In addition to any other relevant factors, please include in your discussion 1) what actions you have taken to comply or seek a variance, which were timely and reasonable under the circumstances.

Compliance with the permit requirement is beyond Imerys' reasonable control. Imerys discussed the issue immediately with the District as they were onsite to observe the scheduled source testing. Imerys initially expected it would be possible to do an immediate repair or postpone the source test to December 2016. Once the timeframe for replacement parts was understood, request for variance was prepared.

The Baghouse 901 provides PM and PM10 control for the 901 bin located in the Milling Circuit at the Powder Mill. This baghouse is source tested annually and was last tested in May 2015 with all results in compliance. Imerys is requesting this variance to continue operating the Baghouse 901 and to conduct source testing once it is fully repaired to supply sufficient airflow for testing.

- C. Please describe how you would be impacted if you were required to immediately comply with the District rule, regulation or order the subject of this variance request. In addition to any other relevant factors, please discuss why such impacts would result in 1) an arbitrary or unreasonable taking of property, or 2) the practical closing and elimination of a lawful business.

If Imerys were required to immediately comply with District rule, Baghouse 901 and the associated bin would need to be shutdown. These equipment are an integral part of the Milling Circuit at the Powder Mill. Without the use of these equipment, there are certain products that could not be produced. The products that require the use of this equipment represent a significant amount of market share. Imerys has a production schedule that is established to meet expected customer needs. If the Baghouse 901 were not allowed to operate would mean a lost revenue of \$10,000 per day and the potential to lay off 2 employees.

In addition to present revenue losses, if Imerys cannot operate to produce all products, future revenue losses may occur due to long term loss of customers if orders cannot be filled. It is not practical to shut down this equipment due to the economic harm that would be caused to Imerys employees and Imerys.

- D. If you were required to immediately comply with the District rule, regulation or order the subject of this variance request, please describe what impact, if any, that would have on air contaminants.

It is necessary to be allowed to operate Baghouse 901 to confirm the expected problem with the motor rotor. With the current airflow, it is not possible to conduct the source test. A variance will allow Imerys to continue to operate, verify the cause of the problem, and implement the corrective actions. Imerys expects to resolve the problem within the variance period and will work to schedule another source test to verify compliance before the end of the variance period.

- E. Please describe what consideration you have given to curtailing operations in lieu of obtaining a variance.

Imerys has considered curtailing operations of BH901; however, as discussed above, any unscheduled system downtime causes economic harm to the company. Imerys is working to schedule a source testing before the end of the variance period.

Although there are no excess emissions anticipated, during the Variance period, Imerys will commit to stopping operations each day of the variance for at least one of the silo baghouses (APCD DevNo's 110191-110198). This is described in the steps and measures to reduce emissions listed in the response to item F below.

- F. Please describe what steps and measures you will take to reduce excess pollutant emissions the maximum extent feasible during the requested variance period.

During the Variance period, Imerys will commit to stopping operations each day of the variance for at least one of the silo baghouses (APCD DevNo's 110191-110198). The eight (8) silo baghouses are each permitted for maximum operations of 2,411 scfm and 2.48 lb/day PM and PM10. In comparison, Baghouse 901 is permitted for a maximum airflow of 2,550 scfm and maximum emissions of 2.62 lb/day PM and PM10. Imerys has already begun to work to resolve the issue with the Baghouse 901. Imerys will continue daily monitoring monitor for visible emissions.

- G. If requested to do so by the District, please describe how you will monitor or otherwise quantify and report to the District any pollutant emissions associated with the granting of your variance.

Imerys is working to schedule the source testing of Baghouse 901 before the end of the variance period. Due to the current very low airflow, excess emissions are not expected. However, if the test results show any excess emissions, Imerys will quantify and report excess emissions based on the source test results.

**6. SUPPLEMENTAL FINDINGS IF APPLYING FOR AN EMERGENCY VARIANCE
PURSUANT TO RULE 506 (EMERGENCY VARIANCE FOR BREAKDOWNS)**

~~-----Item #6, Not Applicable-----~~

- A. Please provide the date and time the breakdown was reported to the District

Date: _____ Time: _____

- B. Breakdown number (as provided by the District): _____

- C. Please provide a description of the "breakdown condition", including equipment involved and the cause to the extent it is known.

- D. Please describe why the continued operation of your facility in a "breakdown condition" is not likely to cause an immediate threat or hazard to public health or safety and will not interfere with the attainment or maintenance of any primary national ambient air quality standard.

7. Will the operation of the equipment subject to this variance result in violation of District Rule 303, Nuisance?

Due to the location of the equipment at the Imerys Lompoc Stationary Source, operation of the equipment subject to this variance will not result in a violation of Rule 303.

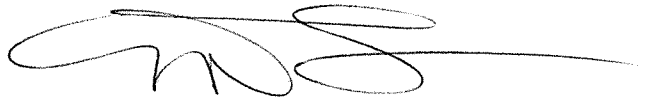
8. Please state whether or not any civil or criminal case involving the equipment subject to this variance is pending any court.

To the best of Imerys' knowledge, there is no known civil or criminal case involving the equipment subject to this variance.

The undersigned is authorized to submit the above Petition on behalf of the Petitioner and further states under penalty of perjury that the above Petition, including any attachments and the items therein set forth, are true and correct.

DATE: December 13, 2016

SIGNATURE:



TITLE: EHS Manager

PRINT NAME: Vindi Ndulute

Variance Filing Fees: All variance Petitions must be accompanied by the requisite filing fee at the time of filing or include a letter from the Petitioner on company letterhead authorizing the District to debit the filing fee from the company's reimbursable account. You may also pay your filing fees by credit card using the attached form. Current variance filing fees may be found under Rule 210, schedule F, Sections 12a and 12b at <http://www.sbcapcd.org/fees.htm>

Credit Card Payment: The Variance Filing Fee may be paid with a credit card. Please use APCD Form -01C to pay via credit card. The form may be downloaded at:
<http://www.sbcapcd.org/eng/dl/dl01.htm>

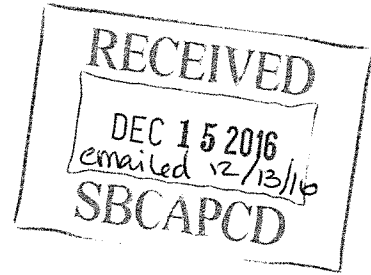


IMERYS

Imerys Minerals California, Inc.

December 13, 2016

SENT VIA CERTIFIED MAIL
7009 0960 0000 8538 1103
RETURN RECEIPT REQUESTED



Mr. Michael McKay
Santa Barbara County APCD
260 N San Antonio Rd, Suite A
Santa Barbara, CA 93110-1315

RE: Imerys Lompoc Stationary Source FID 0012
Petition for Variance

Dear Mr. McKay:

Imerys Minerals California, Inc. (Imerys) is submitting the enclosed petition for variance for the Baghouse 901 (APCD DevNo. 108935) located at the Lompoc Plant. This equipment is permitted by Permit to Operate (PTO) 5840-R5.

Imerys understands that all variance petitions must be accompanied by the requisite filing fee at the time of filing or include a letter from the Petitioner on company letterhead authorizing the District to debit the filing fee from the company's reimbursable account. This letter authorizes Santa Barbara County Air Pollution Control District to debit the variance filing fee stipulated in Rule 210 from the Imerys Minerals California Inc. reimbursable account.

Sincerely,

Vindi Ndulute
EHS Manager

Enclosure