



HEARING BOARD STAFF REPORT

TYPE: 90-Day VARIANCE

CASE NO: 2016-45-N

DATE: January 04, 2017

1.0 **GENERAL INFORMATION:**

- 1.1 **PETITIONER NAME:** Imerys Minerals California, Inc. (Imerys)
- 1.2 **EQUIPMENT LOCATION:** Petitioner operates the equipment described in the Petition at 2500 Miguelito Road, Lompoc, CA
- 1.3 **PERMIT NUMBER(S):** Part 70/Permit to Operate 5840-R5
- 1.4 **FACILITY NAME/ID:** Imerys Minerals California, Inc., FID 00012
- 1.5 **FACILITY DESCRIPTION:** Imerys Minerals California, Inc. Stationary Source (SSID #01735) is the sole owner and operator of the Lompoc Plant, located at 2500 Miguelto Road, approximately one-mile south of the City of Lompoc, California. Imerys Minerals California, Inc is permitted to mine diatomaceous earth (DE) and associated processing, which has occurred at the site for over 100 years. Operations include the following plants: Powder Mill, Specialties, Quarry and Celpure.

- 2.0 **REASON FOR THE VARIANCE REQUEST:** Baghouse 901, is subject to annual source testing, which was scheduled on October 25, 2016. During the source test equipment setup, it was discovered there was insufficient airflow to conduct the source test. As a result, source testing was not performed. Imerys requested and was granted a short term source test extension through December 31, 2016, to determine the cause. It was determined the rotor of the associated blower was the cause of insufficient air flow. Imerys has contacted the blower manufacturer and is also investigating another supplier. However, repairs and source testing cannot be completed prior to December 31, 2016. As a result, the Petitioner is requesting relief from the source testing requirements for baghouse 901 until repairs can be made. During the variance period, the Petitioner has committed to decreasing the inlet air flow of baghouse 901 to ensure the damaged equipment operates as permitted. Imerys will continue to perform the required daily monitoring for visible emissions during operation and will conduct source testing once it is fully repaired.

- 3.0 **BACKGROUND:** A Petition for an Interim/90-Day Variance was submitted on December 13, 2016 by Imerys Minerals California, Inc. On December 21, 2016, Interim Variance Order 2016-44-I was granted by Hearing Board member Lee-Volker Cox, for the period of January 1, 2017 through March 31, 2017, or the date a successful source test is performed, or the date of decision of the Petitioner's request for a 90-Day Variance, whichever occurs first. If granted, 2016-45-N would grant enforcement relief from January 04, 2017 through March 31, 2017, or the date a successful source test is performed, whichever occurs first.

- 4.0 **PERMITTING HISTORY:** Parts of the facility were built before 1950, however, most was built in the 1950's. As a result, construction and operation predated the formation of the District. The District first issued permits for the systems to Johns-Manville, which later became Manville Sales Corporation. Celite Corporation purchased the facility in 1991 and

changed its name to Imerys Minerals California in 2012. Since the last Part 70/Permit to Operate reevaluation, Imerys has completed a major plant modernization. The current permit incorporates the modernization. Additional information regarding the facility may be located on the District website (<https://www.ourair.org/lompoc-diatomite-plant/>).

- 5.0 COMPLIANCE HISTORY:** The following table shows the compliance history for Imerys for the past five (5) years. The permit conditions listed in Section 6.0 below have not been violated.

NOV #	Issued	Violation Description
11131	10/21/2016	Failed to conduct daily portable analyzer monitoring
10997	9/2/2016	Exceeded PM emission rate during air toxic emission testing on Celpure scrubber
10998	9/2/2016	Exceeded air flow on baghouse 789 during source testing
10999	9/2/2016	Failed to conduct quarterly Method 9 Visible Emissions Evaluation on the Mortar Plant Vent Baghouse
11125	9/2/2016	Failed to maintain 90% data recovery efficiency for 7 System
10464	4/29/2014	Failed to conduct Method 9 Visible Emission Evaluation on baghouse 5DC-01, 925A, 109A, 109B and 912
10465	4/29/2014	Failed to conduct Method 22 Visible Emission Evaluation
10461	4/18/2014	Failed to maintain 90% data recovery efficiency for 6 System
10462	4/18/2014	Failed to conduct source testing within the specified source testing parameters on the 7 System Venturi Scrubber/Packed Bed Tower
10463	4/18/2014	Failed to maintain the wind speed and direction monitor and recorder in continuous operation
10170	12/9/2013	Failed to measure DE at the Celpure Plant
10171	12/9/2013	Operated the 7 System Venturi Scrubber outside the allowable pressure drop range
10172	12/9/2013	Operated baghouse 717 outside the allowed differential pressure drop range
9856	4/16/2012	Exceeded the DE sulfur content at the Celpure Plant
9853	3/22/2012	Exceeded the PM emissions rate during source test
9854	3/22/2012	Failed to maintain the baghouse daily pressure drops recordkeeping
9855	3/22/2012	Failed to maintain the daily visible emissions observations
9849	2/21/2012	Failed to maintain the 7 System pH within the operational range
9847	1/12/2012	Failed to conduct the annual source test on baghouse BH775

- 6.0 REGULATORY ANALYSIS:** The following permit conditions of Part 70/Permit to Operate 5840-R5 are applicable to the variance request:

- **Condition 9.C.7 (Baghouses)**
 - (c) *Monitoring: The following source testing and periodic monitoring conditions shall apply:*
 - (viii) *Source Testing - Imerys shall perform source testing of air emissions and process parameters listed in Table 9.12 (Source Test Requirements for Baghouses and Rotoclones) for the baghouses. Imerys shall adhere to the Source Testing permit condition 9.C.12. The frequency shall be as*

specified in condition 9.C.12(a). [Ref: 40 CFR 70.6, ATC 8202-01; ATC 9192, ATC 12091, ATC 12208, ATC 12398; ATC 13570]

- **Condition 9.C.12 (Source Testing)**

- (a) *Frequency: Imerys shall perform third party source testing of air emissions and process parameters listed in Table 9.11, Table 9.12, and Table 9.13.*
 - (ii) *Baghouse Test Schedule - The baghouses shall be source tested consistent with the frequency stated in Table 9.10, with April 1st as the anniversary date. The specified month of testing for the above noted equipment units may be modified if approved in advance by the District. If an equipment item in Table 9.10 cannot be tested due to non-operational status, and all operational equipment units have been tested in the group, (i.e. a cycle completed) Imerys shall commence the next cycle of testing. In addition, any unit that was unable to be tested due to non-operation in the previous cycle, shall be tested within 90 days of startup. [Ref: ATC 8202, ATC 12091, ATC 12208, ATC 12398; ATC 13570]*

Source Testing of the 7 System baghouses shall be conducted annually (except baghouse BH717, which shall be tested at least once every 6 years) and in accordance with Table 9.10 of this permit. [Ref PTO 12105]

- 7.0 **EMISSIONS ANALYSIS:** There are no expected excess emissions related to the granting of this Variance. However, if the source test results show excess emissions, Imerys will quantify and report those emissions based on the source test results.
- 8.0 **AIR TOXICS:** There are no expected excess air toxic emissions related to the granting of this Variance.
- 9.0 **OTHER FACTORS:** none
- 10.0 **DISTRICT RECOMMENDATION:** The District supports the Petitioner's request and recommends the granting of an Interim Variance to Imerys Minerals California, Inc. as listed in the attached draft variance order.
- 11.0 **ATTACHMENTS:**
- Attachment 1 – Draft 90-Day Variance Order 2016-45-N



Michael McKay, Inspector
Compliance Division

12/23/16

Date