

November 27, 2018

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale Street Suite 600  
San Francisco, CA 94105  
Attn: Title V Reports

SUBJECT: Title V Semi-Annual Monitoring Report #2  
Reporting Period: May 1, 2018 to October 31, 2018  
Criterion Catalysts & Technologies LP  
Bay Point, CA - Facility #A0227

Dear Director of Compliance & Enforcement,

Enclosed is the Title V Semi-Annual Monitoring Report for the monitoring period of May 1, 2018 to October 31, 2018 for Criterion Catalyst & Technologies.

**Report Summary**

There were no instances during the reporting period (May 1, 2018 to October 31, 2018) where permit conditions were exceeded.

**Certification of Compliance Monitoring**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions regarding these matters, please contact Eric Brink at (925) 313-8645.

Thank you,



Dave Schofield  
Plant Manager  
Criterion Catalysts & Technologies, LP

File: AR-T5R-40.48

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The following tables list the compliance status for each source. An "X" in the Yes column means that unit is in compliance. An asterisk placed by "X\*" or an "I\*" (intermittent) indicates that there was an episode report and a breach of the permit conditions during the time frame of the report.

**Table VII - A**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S1 - XI MULLER**

Type of Limit	Citation of Limit	FE	Y/N	Future Effective Date	Limit	Monitoring Requirement	Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
										Yes	No
Opacity	BAAQMD 6-301		N		Ringelmann	1.0 for < 3 minutes/hr	#8444, part 3	condition	Bag failure	warning	X
Opacity	SIP 6-301		Y		Ringelmann	1.0 for < 3 minutes/hr	#8444, part 3	condition	Bag failure	warning	X
	BAAQMD condition #8444, part 1		Y		Ringelmann	1.0	#8444, part 3	condition	Bag failure	warning	X
FP	BAAQMD 6-1-310		N		0.15 gr/dscf	BAAQMD	#8444, part 3	condition	Bag failure	warning	X
	BAAQMD 6-311		N		4.10 <sup>67</sup> lb/hr, where P is process weight, ton/hr				None		X
FP	SIP 6-310		Y		0.15 gr/dscf	BAAQMD	#8444, part 3	condition	Bag failure	warning	X
	SIP 6-311		Y		0.15 gr/dscf	BAAQMD	#8444, part 3	condition	Bag failure	warning	X
	BAAQMD condition #8444, part 2		Y		0.006 gr/dscf	BAAQMD	#8444, part 3	condition	Bag failure	warning	X
Air flow rate	BAAQMD condition 8444, part 2		Y		1,116 scfm				N	None	X

**Table VII - B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S2 - X1 DRYER S407 – X2 DRYER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
	BAAQMD condition #13099, part 1	Y		Ringelmann 1.0	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13099, part 3	Y		0.006 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13099, part 3	Y		8,000 scfm	NONE	N	NONE	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hrs	NONE	N	NONE	X	
	BAAQMD 9-1-311.2	N		50 lbs/hr	NONE	N	NONE	X	
SO2	SIP 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	SIP 9-1-311.2	Y		50 lbs/hr	NONE	N	NONE	X	

**Table VII - C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S3 - XI DRIED PRODUCT ELEVATOR**  
**S4 - XI DRIED PRODUCT SCREENER**  
**S5 - XI LONG BREAKER**  
**S6 - XI KILN FEED CONVEYOR SYSTEM**  
**S8 - XI CALCINED PRODUCT ELEVATOR**  
**S9 - XI CALCINED PRODUCT SCREENER**  
**S10 - XI CALCINED PRODUCT PACKAGING**

Type of Limit	Citation of Limit	FE	Y/N	Effective Date	Future	Requirement	Monitoring (P/C/N)	Monitoring Frequency	Monitoring Type	Compliance
Opacity	6-301	N		Ringelmann 1.0 for < 3 minutes/hr		NONE	N	NONE		X
Opacity	6-301	Y		Ringelmann 1.0 for < 3 minutes/hr		NONE	N	NONE		X
FP	6-1-310	N		0.15 gr/dscf		NONE	N	NONE		X
	6-1-311			4.10P <sup>67</sup> lb/hr, where P is process weight, ton/hr		NONE	N	NONE		X
FP	6-310	Y		0.15 gr/dscf		NONE	N	NONE		X
	SIP	Y		4.10P <sup>67</sup> lb/hr, where P is process weight, ton/hr		NONE	N	NONE		X
Through-put	BAAQMD #16736, part 1	Y		8,000 tons/yr		BAAQMD #16736, part 8	P/D	Record keeping		X
FP	BAAQMD #16736, part 2	Y		0.003 gr/dscf		BAAQMD #16736, part 6	C	Bag failure warning device		X
Nickel content	BAAQMD #16736, part 3	Y		Daily Max: 7% Monthly Max: 6%		BAAQMD #16736, part 8	P/D	Record keeping		X
Air flow rate	BAAQMD #16736, part 7	Y		5,500 scfm		None	N	None		X



**Table VII - D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S7 - X1 KILN -- S413 – X2 KILN**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
	BAAQMD 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	BAAQMD condition #13100, part 3	Y		0.006 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13100, part 3	Y		8,000 scfm	NONE	N	NONE	X	
NOx	BAAQMD condition #13100, part 6	Y		58 lb/day or 21,000 lb/yr	BAAQMD condition #13100, part 8	C	CEM	X	
Natural gas	BAAQMD condition #13100, part 4	Y		700,000 therms at S7	BAAQMD condition #13100, part 9 & 10	C	Fuel meter, record keeping	X	
	BAAQMD condition #13100, part 5	Y		700,000 therms at S413	BAAQMD condition #13100, part 9 & 10	C	Fuel meter, record keeping	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
SO2	SIP 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	SIP 9-1-311.2	Y		50 lbs/hr	NONE	N	NONE	X	

**Table VII - E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S11 - XI CALCINED PRODUCT CONVEYOR**

Type of Limit	Citation of Limit	FE	Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
									Yes	No
Opacity	BAAQMD 6-301, Condition # 16736, part 5	Y			Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-310	N			0.15 gr/dscf	None	N	None	X	
	BAAQMD 6-311	N			4.10 <sup>67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y			0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y			4.10 <sup>67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
Through-put	BAAQMD condition #16736, part 1	Y			8,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
FP	BAAQMD condition #16736, part 2	Y			0.003 gr/dscf	BAAQMD condition #16736, part 6	C	Bag failure warning device	X	

**Table VII - F  
Applicable Limits and Compliance Monitoring Requirements  
S19 – X1 RECYCLE STATION**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD 6-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
Through-put	BAAQMD condition #16736, part 1	Y		3,667 tons/yr	BAAQMD condition #16736, part 6	P/D	Record keeping	X	
FP	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf	BAAQMD condition #16736, part 6	C	Bag failure warning device	X	

**Table VII - G  
Applicable Limits and Compliance Monitoring Requirements  
S104 - H1 BLENDING TANK T-1  
S105 - H1 BLENDING TANK T-2  
S106 - H1 BLENDING TANK T-3**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement	Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
									Yes	No
Opacity	BAAQMD 6-1-301, Condition 9984, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition 9984, part 3			Bag failure warning device	X	
Opacity	SIP 6-301, Condition 9984, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition 9984, part 3			Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition 9984, part 3			Bag failure warning device	X	
FP	BAAQMD 6-1-311	N		where P is process weight, ton/hr	None			None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition 9984, part 3			Bag failure warning device	X	
SIP	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None			None	X	
BAAQMD	BAAQMD Condition 9984, part 2	Y		0.006 gr/dscf	BAAQMD Condition 9984, part 3			Bag failure warning device	X	
Air flow rate	BAAQMD Condition 9984, part 2	Y		3,500 scfm	None			None	X	

**Table VII - H  
Applicable Limits and Compliance Monitoring Requirements  
S107 - H1 LIQUID/SOLID BLENDER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	

**Table VII - I  
Applicable Limits and Compliance Monitoring Requirements  
S303 - ALUMINA RECEIVING FLUIDSTAT STATION  
S309 – ALUMINA RECIRCULATION FLUIDSTAT STATION  
S310 – ALUMINA MEASURING FLUIDSTAT STATION**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	

**Table VII - J**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S304 - ALUMINA SILO 1**  
**S305 - ALUMINA SILO 2**  
**S306 - ALUMINA SILO 3**  
**S307 - ALUMINA SILO 4**  
**S308 - ALUMINA SILO 5**

Type of Limit	Citation of Limit	FE	Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
									Yes	No
Opacity	BAAQMD 6-1-301	N			Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y			Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
FP	BAAQMD 6-1-310	N			0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N			4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y			0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y			4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	



**Table VII - K**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S311 - ALUMINA BULK BAG UNLOADER**  
**S312 – ALUMINA REPACKAGING STATION**  
**S313 – FINES GRINDER FEED HOPPER SYSTEM**  
**S323 – FINES GRINDER FEED HOPPER SYSTEM (SECONDARY)**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #3344, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #3344, part 5	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #3344, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #3344, part 5	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #3344, part 5	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	BAAQMD 6-310	Y		0.15 gr/dscf	BAAQMD Condition #3344, part 5	C	Bag failure warning device	X	
	BAAQMD 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #3344, part 6	Y		0.005 gr/dscf	BAAQMD condition. #3344, part 5	C	Bag failure warning device	X	
Nickel content	BAAQMD condition #3344, part 8	Y		7% by weight per 24 hour avg at S313/323	BAAQMD condition #3344, part 9	P/H	Record keeping	X	
Through-put (bulk)	BAAQMD condition #3344, part 2	Y		12,480 tons/yr for S311 and S312	BAAQMD condition #3344, part 9	P/D	Record keeping	X	
Through-put (catalyst)	BAAQMD condition #3344, part 3	Y		4,380 tons/yr for S313/323	BAAQMD condition #3344, part 9	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #3344, part 6	Y		2,900 scfm		N			

Table VII - L

Applicable Limits and Compliance Monitoring Requirements

- S314 - REGROUND FINES STORAGE SILO TK-70112
- S315 - REGROUND FINES STORAGE SILO TK-70113
- S316 - REGROUND FINES STORAGE SILO TK-70114
- S317 - REGROUND FINES STORAGE SILO TK-70115
- S318 - FINES WEIGH HOPPER BLOW POT
- S319 - FINES BAGOUT STATION NO.1 & NO.2
- S320 - FINES GRINDER
- S322 - FINES TANKER TRUCK DELIVERY SYSTEM

Compliance	Type of Limit	Citation of Limit	FE	Y/N	Future Effective Date	Limit	Monitoring Requirement	Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
											Yes	No
	Opacity	BAAQMD	N			Ringelmann 1.0 for	BAAQMD	#8468, part 5	C	Bag failure	warning	X
	Opacity	SIP	Y			Ringelmann 1.0 for	BAAQMD	condition	C	Bag failure	warning	X
	FP	BAAQMD	N			0.15 gr/dscf	BAAQMD	condition	C	Bag failure	warning	X
	FP	BAAQMD	N			0.15 gr/dscf	BAAQMD	#8468, part 5	C	Bag failure	warning	X
		BAAQMD	N			4.10P <sup>0.67</sup> lb/hr,	NONE	NONE	N	NONE		X
		BAAQMD	Y			4.10P <sup>0.67</sup> lb/hr,	NONE	NONE	N	NONE		X
	FP	SIP	Y			where P is process						
		BAAQMD	Y			0.005 gr/dscf	BAAQMD	condition.	C	Bag failure	warning	X
		#8468, part 6										
	Nickel content	BAAQMD	Y			7% by weight per	BAAQMD	#8468, part 5	P/H	Record keeping		X
	Through-put (catalyst)	BAAQMD	Y			4,380 tons/yr for	BAAQMD	#3344, part 9	P/D	Record keeping		X
	Air flow rate	BAAQMD	Y			3,000 scfm from	NONE	NONE	N	NONE		X

**Table VII - M  
Applicable Limits and Compliance Monitoring Requirements  
S321 - ALUMINA STORAGE SILO**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13092, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13092, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #13092, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13092, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13092, part 4	Y		0.005 gr/dscf	BAAQMD condition. #13092, part 3	C	Bag failure warning device	X	
Through-put (Alumina)	BAAQMD condition #13092, part 2	Y		9,636 tons/yr	BAAQMD condition #13092, part 5	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #13092, part 4	Y		150 scfm	NONE	N	NONE	X	

**Table VII - N**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S401 - X2 MULLER**

Type of Limit	Citation of Limit	FE	Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
									Yes	No
Opacity	6-1-301	N			Ringelmann 1.0	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
Opacity	6-301	Y			Ringelmann 1.0	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
FP	6-1-310	N			0.15 gr/dscf	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
	6-1-311	BAAQMD	N		4.10 <sup>±0.67</sup> lb/hr; where P is process	NONE	N	NONE	X	
FP	6-310	SIP	Y		0.15 gr/dscf	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
	6-311	SIP	Y		4.10 <sup>±0.67</sup> lb/hr; where P is process	NONE	N	NONE	X	
	BAAQMD condition #8445, part 2	BAAQMD	Y		0.006 gr/dscf	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #8445, part 2	BAAQMD	Y		1,116 scfm	NONE	N	NONE	X	

**Table VII - O**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S408 - X2 DRIED PRODUCT ELEVATOR**  
**S409 – X2 DRIED PRODUCT SCREENER**  
**S410 – X2 LONG BREAKER**  
**S412 – X2 KILN FEED CONVEYOR**  
**S414 – X2 CALCINED PRODUCT ELEVATOR**  
**S415 – X2 CALCINED PRODUCT SCREENER**  
**S416 – X2 CALCINED PRODUCT PACKAGING**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
FP	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
FP	SIP6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
Through-put	BAAQMD condition #16736, part 1	Y		9,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
FP	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf	BAAQMD condition #16736, part 6	C	Bag failure warning device	X	
Nickel content	BAAQMD condition #16736, part 3	Y		Daily Max: 7% Monthly Max: 6% 12 mo RC:6%	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #16736, part 7	Y		8,600 scfm	None	N	None	X	

**Table VII - P**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S417 - X2 CALCINED PRODUCT CONVEYOR**  
**S418 - X2 RECYCLE STATION**  
**S515 - H2 SOLID ADDITIVE HOPPER A**  
**S516 - H2 SOLID ADDITIVE HOPPER B**  
**S517 - H2 PRODUCT RECYCLE SYSTEM**  
**S518 - H2 CALCINED FEED SYSTEM**  
**S519 - H2 SPHERICAL HOPPER SYSTEM**  
**S520 - H2 CALCINED FEED BAGOUT STATION**

Type of Limit	Citation of Limit	FE Y/N	Future Efficacy	e Date	Limit	Monitoring Requirement	Citation	Monitoring Frequency (P/C/N)	Monitoring g Type	Compliance	
										Yes	No
Opacity	BAAQMD	N			Ringelmann 1.0 for < 3 minutes/hr	NONE		N	NONE		X
Opacity	SIP	Y			Ringelmann 1.0 for < 3 minutes/hr	NONE		N	NONE		X
FP	BAAQMD	N			0.15 gr/dscf	NONE		N	NONE		X
FP	BAAQMD	N			4.10P <sub>0.67</sub> lb/hr, where P is process weight, ton/hr	NONE		N	NONE		X
FP	SIP	Y			0.15 gr/dscf	NONE		N	NONE		X
Through-put	BAAQMD	Y			S417: 9,000 tons/yr S418: 9,000 tons/yr S419: 1,700 tons/yr S515: 3,300 tons/yr S516: 12,000 tons/yr S517: 12,000 tons/yr S518: 12,000 tons/yr S519: 12,000 tons/yr S520: 12,000 tons/yr	BAAQMD		P/D	Record keeping	X	X
FP	BAAQMD	Y			S418/419: 0.003 gr/dscf S515/516: 0.006 gr/dscf S517/518/519/520: 0.003 gr/dscf	BAAQMD	#16736, part 6	C	Bag failure warning device	X	
Nickel content	BAAQMD	Y			S418/419: Daily Max: 7% Monthly Max: 6% S515/516: Daily Max: 15% Monthly Max: 7% S517/518/519/520: Daily Max: 8% Monthly Max: 7% 12 mo RC:7%	BAAQMD	#16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD	Y			S418/419: 8,600 (A42) S515/516: 1,200 (A52/53) S517/518/519/520: 11,000 scfm (A55)	None		N	None	X	



**Table VII – Q  
Applicable Limits and Compliance Monitoring Requirements  
S502 - NICKEL SOLUTION TANK**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Ni	BAAQMD Regulation 2-1, Table 2-1-316	Y		0.73 lb/yr	BAAQMD 2-1-316.1	P/Annual	Record keeping	X	

**Table VII – R  
Applicable Limits and Compliance Monitoring Requirements  
S504 - H2 BLENDING TANK T-1                      S505 – H2 BLENDING TANK T-2  
S506 – H2 BLENDING TANK T-3                      S507 – H2 LIQUID/SOLID BLENDER  
S509 – H2 KILN FEED CONVEYOR                      S510 – H2 Kiln**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	Y		0.15 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
	BAAQMD 6-1-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #9315, part 4	Y		0.006 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #9315, part 4	Y		7,500 scfm		N			
NOx	BAAQMD condition	Y		120 lb/day	BAAQMD condition #9315, part 13	P/A and D	Source test (A), Record	X	

									#9315, part 10
NH3	BAAQMD condition	2,200 lb/day, and 200 lb/day (when A-56 in operation)	#9315, part 13	P/A and D	Source test (A), Record keeping (D)				
CO	BAAQMD condition	400 ppmv dry @ 3% Oxygen	#9315, part 13	P/A	Source test				
Temp-	BAAQMD condition	1450 degree F	BAAQMD condition #9315, part 7	C	Temperature Monitor				
(A-56)	BAAQMD condition								#9315, part 9
Residence time	BAAQMD condition	0.4 second	BAAQMD condition #9315, part 13	P/A	Source test				
Through-put	BAAQMD condition	12,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping				
FP	BAAQMD condition	S509: 0.003 gr/dscf	BAAQMD condition #16736, part 6	C	Bag failure warning device				
Nickel content	BAAQMD condition	S509: Daily Max: 8% Monthly Max: 7% 12 mo RC:7%	BAAQMD condition #16736, part 8	P/D	Record keeping				
Air flow rate	BAAQMD condition	S509: 11,000 scfm (A55)	None	N	None				

**Table VII - S**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S511 – H2 PRODUCT CONVEYOR**  
**S512 – H2 PRODUCT SCREENER**  
**S513 – H2 PRODUCT PACKAGING**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
Throughput	BAAQMD condition #16736, part 1	Y		12,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
FP	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf	BAAQMD condition #16736, part 6	C	Bag failure warning device	X	
Nickel content	BAAQMD condition #16736, part 3	Y		S511/512/513: Daily Max: 8% Monthly Max: 7% 12 mo RC:7%	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #16736, part 7	Y		S511/512/513: 11,000 scfm (A55)	None	N	None	X	

**Table VII - T**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S600 - X3 DRIED EXTRUDER, SCREENER, CONVEYOR**

Type of Limit	Citation of Limit	FE	Y/N	Date Effective	Future	Limit	Monitoring Requirement	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
										Yes	No
Opacity	BAAQMD 6-1-301, condition #13093, part 2	N				Ringelmann 1.0 for < 3 minutes/hr	None	N	None		X
Opacity	BAAQMD 6-301, condition #13093, part 2	Y				Ringelmann 1.0 for < 3 minutes/hr	None	N	None		X
FP	BAAQMD 6-1-310	N				0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device		X
BAAQMD 6-1-311		N				4.10P <sup>67</sup> lb/hr, where P is process weight, ton/hr	None	N	None		X
FP	SIP 6-310	Y				0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device		X
SIP 6-311		Y				4.10P <sup>67</sup> lb/hr, where P is process weight, ton/hr	None	N	None		X
BAAQMD condition #13093, part 3		Y				12,000 scfm	None	N	None		X
Through-put	BAAQMD condition #13093, part 4	Y				36 tons/DAY	BAAQMD condition #13093, part 5	P/D	Record keeping		X
Nickel & Nickel compounds	BAAQMD condition #13093, part 1	Y				3.0% by weight per year	BAAQMD condition #13093, part 5	P/D	Record keeping		X

**Table VII - U  
Applicable Limits and Compliance Monitoring Requirements  
S601 - X3 FINES SURGE HOPPER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13094, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #13094, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13094, part 4	Y		0.006 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13094, part 4	Y		100 scfm		N			
Through-put (catalyst)	BAAQMD condition #13094, part 2	Y		1,400 tons/yr	BAAQMD condition #13094, part 5	P/D	Record keeping	X	

**Table VII - V  
Applicable Limits and Compliance Monitoring Requirements  
S602 - X3 ALUMINA SURGE HOPPER**

Compliance	Monitoring Type	Monitoring Frequency (P/C/N)	Monitoring Requirement	Limit	Future Effective Date	FE Y/N	Citation of Limit	Type of Limit	Compliance	
									Yes	No
	Opacity	C	BAAQMD #13095, part 3 Condition	minutes/hr 1.0 for < 3		N	BAAQMD 6-1-301, condition #13095, part 1	Opacity	X	Bag failure warning device
	Opacity	C	BAAQMD #13095, part 3 Condition	minutes/hr 1.0 for < 3		Y	SIP 6-301, condition #13095, part 1	Opacity	X	Bag failure warning device
	FP	C	BAAQMD #13095, part 3 Condition	0.15 gr/dscf		N	6-1-310 BAAQMD	FP	X	Bag failure warning device
		N	NONE	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr		N	6-1-311 BAAQMD		X	NONE
	FP	C	BAAQMD #13095, part 3 Condition	0.15 gr/dscf		Y	6-310 SIP	FP	X	Bag failure warning device
		N	NONE	4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr		Y	6-311 SIP		X	NONE
		C	BAAQMD #13095, part 3 Condition	0.006 gr/dscf		Y	BAAQMD condition #13095, part 4		X	Bag failure warning device
	Air flow rate	N	BAAQMD #13095, part 4 condition	200 scfm		Y	BAAQMD condition #13095, part 4	Air flow rate	X	NONE
	Through-put (Alumina)	P/D	BAAQMD #13095, part 5 condition	9.636 tons/yr		Y	BAAQMD condition #13095, part 2	Through-put (Alumina)	X	Record keeping



**Table VII - W  
Applicable Limits and Compliance Monitoring Requirements  
S603 - X3 EXTRUDER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13096, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301, condition #13096, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
NH3	BAAQMD #15672, part 5	Y		490 lb/day or 48,000 lb/yr	BAAQMD condition #15672, part 11	P/A	Source test	X	
Through-put	BAAQMD condition #13096, part 2	Y		31,665 tons/yr	BAAQMD condition #13096, part 3	P/D	Record keeping	X	
Nickel content	BAAQMD condition #15672, part 10	Y		3.0% by weight per year	BAAQMD condition #15672, part 14	P/M	Record keeping	X	

**Table VII - X  
Applicable Limits and Compliance Monitoring Requirements  
S604 - X3 DRIVER**

Type of Limit	Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement	Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
										Yes	No
Opacity	6-1-301, condition #13097, part 1	BAAQMD	N		Ringelmann	1.0 for < 3	Condition #13097, part 3	C	Pressure drop monitoring device	X	
Opacity	6-301, condition #13097, part 1	SIP	Y		Ringelmann	1.0 for < 3	Condition #13097, part 3	C	Pressure drop monitoring device	X	
FP	6-1-310	BAAQMD	N		0.15 gr/dscf	BAAQMD	Condition #13097, part 3	C	Pressure drop monitoring device	X	
	6-1-311	BAAQMD	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	NONE	N	NONE	X	
FP	6-310	SIP	Y		0.15 gr/dscf	BAAQMD	Condition #13097, part 3	C	Pressure drop monitoring device	X	
	6-311	SIP	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	NONE	N	NONE	X	
		BAAQMD	Y		0.005 gr/dscf	BAAQMD	Condition #13097, part 3	C	Pressure drop monitoring device	X	
NH3	#15672, part 5	BAAQMD	Y		490 lb/day or 48,000 lb/yr	BAAQMD	Condition #15672, part 11	P/A	Source test	X	
Nickel content	#15672, part 10	BAAQMD	Y		3.0% by weight per year	BAAQMD	Condition #15672, part 14	P/M	Record keeping	X	
Air flow rate	#13097, part 4	BAAQMD	Y		12,000 scfm	NONE	NONE	N	NONE	X	
Natural gas	condition #13097, part 5	BAAQMD	Y		534,360 therms/yr	BAAQMD	Condition #13097, part 6 and 7	C/M	Fuel meter and Record keeping	X	

**Table VII - Y**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S606 - X3 CALCINER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #15672, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #15672, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #15672, part 3	Y		0.005 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
NOx	BAAQMD condition #15672, part 6	Y		51 lb/day or 18,500 lb/yr	BAAQMD condition #15672, part 12	C	CEM	X	
CO	BAAQMD condition #15672, part 9	Y		19,524 lb/yr	BAAQMD condition #15672, part 12	C	CEM	X	
CO abatement efficiency	BAAQMD condition #15672, part 8	Y		> 90% mass basis efficiency when outlet is >40ppm on a rolling 8 hour average	BAAQMD condition #15672, part 12	C	CEM	X	
NH3	BAAQMD #15672, part 5	Y		490 lb/day or 48,000 lb/yr	BAAQMD condition #15672, part 11	P/A	Source test	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	BAAQMD 9-1-311.2	N		50 lbs/hr	NONE	N	NONE	X	
SO2	SIP	Y		GLC of 0.5 ppm for 3	NONE	N	NONE	X	

9-1-301	min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours								
9-1-311.2	SIP	Y	50 lbs/hr	NONE	N	NONE			X
BAAQMD condition #15672, part 10	3.0% by weight per year	Y		BAAQMD condition #15672, part 14	P/M	Record keeping			X
BAAQMD condition #15672, part 3	1,736 scfm	Y		NONE	N	NONE			X
BAAQMD condition #15672, part 4	700,000 therms at S606	Y		BAAQMD condition #15672, part 13 & 14	P/C/M	Fuel meter, Record keeping			X
Natural gas									

**Table VII - Z**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S612 - EMERGENCY STANDBY DIESEL FIRE PUMP ENGINE**

Limit	Type of	Limit	Citation of	FE	Y/N	Date	Effective	Future	Limit	Citation	Monitoring Requirement	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance		
														Yes	No	
		BAAQMD	Regulation 9-8								BAAQMD	Regulation 9-8-530	Monthly	Record keeping		X
		BAAQMD	condition #22851						34 hours/year (reliability)		BAAQMD	condition #22851, part 4	Monthly	Record Keeping	X	

**Table VII – AA**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S12 – X1 BULK BAG UNLOADER STATION**  
**S13 – X1 BBU CONVEYOR FEEDER**  
**S14 – X1 BBU CONVEYOR**  
**S15 – X1 BBU MULLER FEEDER SURGE BIN**  
**S16 – X1 BBU MULLER FEEDER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
	BAAQMD condition #8444, part 1	Y		Ringelmann 1.0	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
	BAAQMD 6-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr		N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		0.15 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
	BAAQMD condition #8444, part 2	Y		0.006 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition 8444, part 2	Y		1,116 scfm		N	None	X	
Through-put	BAAQMD condition #8444, part 4	Y		100 tons/yr (nickel fines) 60 tons/yr (nickel Carbonate)	BAAQMD condition #8444, part 5	P/D	Record keeping	X	
Nickel content	BAAQMD condition #8444, part 4	Y		3% Nickel (avg) Nickel fines 64.5% Nickel (avg) Nickel Carbonate	BAAQMD condition #8444, part 5	P/D	Record keeping	X	

