



**MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT**

14306 Park Avenue Victorville, CA 92392-2310  
 760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

**AUTHORITY TO CONSTRUCT**

B013778

If construction is not completed by the expiration date of this permit, it may be renewed for one additional year upon payment of applicable fees. Any additional extension will require the written approval of the Air Pollution Control Officer. This Authority to Construct may serve as a temporary Permit to Operate provided the APCO is given prior notice of intent to operate and the Permit to Operate is not specifically denied.

**EXPIRES LAST DAY OF: SEPTEMBER 2026**

**OWNER OF OPERATOR (Co. #2935)**

SBC Investment, LLC  
 13057 Athol Street  
 Trona, CA 93562

**EQUIPMENT LOCATION (Fac. #3972)**

Panamint Valley Limestone  
 13057 Athol Street  
 Trona, CA 93562

**Description:**

LIME KILN SYSTEM consisting of:

**EQUIPMENT**

Capacity	Equipment Description
56	vertical kiln 56 MMBtu/hr (56 MMBtu/hr)
10	belt conveyor BC-2301 (10 bhp x 2550 btu/bhp)
10	screw conveyor SC-2201 (10 bhp x 2550 btu/bhp)
10	screw conveyor SC-2202 (10 bhp x 2550 btu/bhp)
0	off gas fines bin 200 ton BN-2401
0	truck loading spout SP-2401
177	combustion air blower (177 bhp x 2550 btu/bhp)
177	combustion air blower (177 bhp x 2550 btu/bhp)
177	combustion air blower (177 bhp x 2550 btu/bhp)
50	lance cooling air blower (50 bhp x 2550 btu/bhp)
120	suspended cylinder air blower (120 bhp x 2550 btu/bhp)
120	suspended cylinder air blower (120 bhp x 2550 btu/bhp)

Fee Schedule: 8 (e)

Rating: 59600000 Btu

SIC: 3274

SCC: 30501603

Location/UTM(Km):  
 466E/3960N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

SBC Investment, LLC  
 82532 2nd Street  
 Trona, CA 93562

By: **COPY**  
**Brad Poiriez**  
 Executive Director

Capacity	Equipment Description
120	suspended air blower (120 bhp x 2550 btu/bhp)
148	cooling air blower (148 bhp x 2550 btu/bhp)
148	cooling air blower (148 bhp x 2550 btu/bhp)
148	cooling air blower (148 bhp x 2550 btu/bhp)
0	SCHEDULE 8E (56,000,000 btu + sum of motor horsepower x 2550 btu/hp)/1,000,000

**CONDITIONS:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit. [District Rules 204 and 1302]

2. This equipment shall not operate unless kiln emissions are vented to properly maintained and operational baghouse specified under valid District permit C013787. [District Rules 1302 and 1320]

3. The owner/operator cannot replace existing equipment and/or add new/modified equipment without submitting an application to the District and receiving a new Permit from the District. [District Rule 201]

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5. Within 180 days of startup, the owner/operator shall conduct a District approved initial source test of this equipment to verify that it complies with the following emission factors when using natural gas:

- a. NOx = 22 PPMV nor more than 3.0 lb/hr measured as NO2 at 3% O2
- b. CO = 7 PPMV nor more than 0.6 lb/hr at 3% O2

All measurements shall be taken at the exit of the exhaust stack described in District Permit C013787. [District Rules 1302 - BACT]

6. The owner/operator must conduct an initial performance test (source test) for NOx and CO within 60 days of achieving full production rate, but in no case later than 180 days after initial startup. Additionally, annual source testing for NOx and CO shall be conducted at least once in every 12 month period following the most current test date. All measurements shall be taken at the exhaust of the baghouse described in District Permit C013787.

The NOx source test must be conducted in accordance with USEPA Method 7E or CARB Method 100, the CO source test must be conducted in accordance with USEPA Method 10 or CARB Method 100, and the Stack Gas Oxygen must be measured in accordance with USEPA Method 3 or 3A or ARB Method 100. All tests must be conducted while the furnace is running at a minimum load of 90%.

The owner/operator must submit a source test protocol at least thirty (30) days prior to the scheduled source test date for District review and approval, and the owner/operator must conduct all required tests in accordance with the District-approved test protocol. The owner/operator must notify the District a minimum of ten (10) days prior to the first day of testing so that an observer may be present. The final source test results must be submitted to the District within forty-five (45) days of completion of the test. All compliance/certification test notifications, protocols, and results may be submitted electronically to reporting@mdaqmd.ca.gov [District Rules 204, 1303 and 1320]

7. The owner/operator shall maintain a facility log, on-site, containing at least the two (2) years of most recent data. This log shall be made available to the District personnel upon request and shall contain the following information, as a minimum:

- a. Total operation time (hour/day, hours/month and cumulative hours/rolling twelve months);
  - b. The tons of product processed per day, per month and rolling twelve months;
  - c. Total fuel use kiln (daily, monthly and cumulative hours/rolling twelve months);
  - d. Total fuel use emergency diesel engine (monthly and cumulative hours/rolling twelve months);
  - e. Total fuel use emergency diesel engine-kiln cooling fan (monthly and cumulative hours/rolling twelve months);
  - f. The date and result of each opacity evaluation and any corrective action taken (USEPA Method 22/9 result, District Rule 430 Breakdown documentation, etc.);
  - g. The inspection and maintenance documentation for all control devices (pressure differential readings, calibration checks, quarterly inspections, repairs, etc.);
  - h. The inspection and maintenance documentation for water spray used to control emissions where equipment does not vent to a permitted baghouse.
- [District Rules 204 and 1302]

8. The owner/operator shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

[District Rule 402]

9. The owner/operator shall not cause or allow the emissions of fugitive dust from any transport, handling, construction or storage activity so that the presence of such dust remains visible in the atmosphere beyond the property line of the emission source.

[District Rules 204 and 403]

10. The owner/operator shall ensure that visible emissions from equipment shall not exceed an opacity equal to, or greater than, twenty percent (20%) for a period aggregating more than three (3) minutes in any one (1) hour, excluding uncombined water vapor. There shall be no visible emissions from any conveyor, transfer point, screen, crusher or bucket elevator which is under negative pressure and venting to a permitted baghouse.

[District Rule 401 and 1302]

11. The owner/operator shall submit a dust control plan to the District for approval which documents the methods and frequency of housekeeping precautions which will be taken to prevent visible particulate matter (dirt/dust) from being deposited upon public roadways as a direct result of their operations. Reasonable precautions shall include, but are not limited to, the removal of particulate matter from equipment prior to movement on paved roadways or the prompt removal of any material generated from their operations from paved roadways onto which such material has been deposited. The dust control plan shall address but is not limited to haul vehicles on paved and unpaved roads and the requirements to cover loads of limestone and lime product.

[District Rule 403]

12. The owner/operator shall conduct a monthly 6-minute visible emissions evaluation on each emission point and fugitive emission point associated with this equipment in accordance with USEPA Method 22. The evaluation must be conducted while the affected source is in operation.

[District Rules 204, 401, 402, and 403]

13. In the event that opacity is observed during the USEPA Method 22, the owner/operator must do one of the following:

- a. Conduct a USEPA Method 9 to determine compliance with the opacity limit of condition #8. If the opacity limit of this condition is not violated, the owner/operator must ensure that all equipment and controls are operating correctly, but operations are not required to be shut down. If the opacity limit of condition #8 is violated the owner/operator must adhere to option 'b.' below.
- b. Shut down the affected equipment and take corrective action to preclude any further emissions. Upon restarting the affected equipment, the owner/operator must conduct a USEPA Method 22 and/or Method 9 to demonstrate that the corrective action taken was sufficient. Equipment breakdowns resulting in violation and/or shutdown shall be reported to the District in accordance with District Rule 430.

[District Rules 401, 403 and 430]

14. The facility shall cover or otherwise contain Bulk Material carried on haul trucks.

[District Rules 204 and 403.1]

15. This facility shall not process more than 299,000 tons of limestone ore; and shall not produce more than 160,706 in total lime products in any 12-month period.

[District Rules 1302 and 1320]

16. All permitted equipment shall be located a minimum of 101 meters from the property line.

[District Rule 1320]

17. This facility shall not emit more than:

- a. 8 tpy of a single HAP;
- b. 20 tpy of all HAPs;
- c. 20 tpy of VOC;
- d. 80 tpy of CO
- e. 14.9 tpy of PM10; and,
- f. 20 tpy of NOx

Compliance with these limits shall be demonstrated using rolling 12 month average emission summaries. A current rolling twelve month emission summary shall be made available to District personnel upon request.

[District Rules 1302 and 1320]

18. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request.

[District Rule 107(b); H&S Code 39607 & 44341-44342; and 40 CFR 51, Subpart A]