

ORIGINAL

SV
3/14/24

SOUTH COAST AQMD
CLERK OF THE BOARD

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

2024 FEB 16 PM 1:47

PETITIONER: Innovative Baking Co
dba Venice Baking Company

CASE NO: 6144-2
FACILITY ID: 175187

FACILITY ADDRESS: 22417 S. Vermont Ave.
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Torrance, CA, 90502

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

INTERIM SHORT REGULAR EMERGENCY EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Travis Ellison

Javier Avila

Process Engineer

Plant Manager

22417 S. Vermont Ave.

22417 S. Vermont Ave.

Torrance, CA Zip 90502

Torrance, CA Zip 90502

(714) 620-9240 Ext.

(714) 673-2176 Ext.

Fax ()

Fax ()

E-mail tellison@rich.com

E-mail javila@rich.com

3. RECLAIM Permit Yes No Title V Permit Yes No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

[Empty response box for item 4]

5. Briefly describe the type of business and processes at your facility.

Rich Products Corporation is a family owned food company with 75 years of experience and expertise in the kitchen. The business focuses in food service, retail, in-store bakery, deli, prepared foods, among others.
The focus on this permit is to allow the business to run its oven to produce pizza crust. The oven will produce exhaust fumes, which will be collected and directed into the Regenerative Thermal Oxidizer (RTO) to be treated and safely released.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Baking Oven No. 1	G74241		
Regenerative/Recuperative Oxidizer - Ceramic/Hot Rock	G74245		

*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

Ship & Shore Environmental's (SSE's) VOC Abatement System, Regenerative Thermal Oxidizer (RTO), is used in many industries to combat pollutants, notably hydrocarbons. The exhaust gases from many industrial processes contain Volatile Organic Compounds (VOCs). When released into the atmosphere, VOCs contribute to the formation of harmful ozone and health hazards.

SSE's RTO uses its main process fan to intake hazardous process fumes produced the facility's oven, through the use of the specially designed collection ducting system. The RTO will combust the process fumes and perform a 98% destruction efficiency. The treat flow will then be released through its main stack.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No
Daily, Monthly, Quarterly.
 If yes, how often: Semi-Annual, Annual Date of last maintenance and/or inspection N/A

Describe the maintenance and/or inspection that was performed.

RTO is not installed yet, no maintenance or inspection performed yet.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Condition 4 of P/O No. G74241	Condition #4 requires that the Oven be connected to the RTO when in operation. We would like to operate the oven without the RTO in operation until the RTO is functional.
Condition 4 of P/O No. G74245	Condition #4 of the RTO permit requires that the RTO be in full operation whenever the Oven is in operation.
203(b) & 3002(c1)	

10. Are the equipment or activities subject to this request currently under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes No

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

The overall project, which consists of a new oven, new oxidizer, new proofer, and accompanying conveyors has involved multiple meetings with contractors to produce a schedule with individual tasks, each being important to the success of completing the project by the finalized start date of March 18th. The project is considered completed upon commissioning and all parameters between the Oven and the RTO are functional.

There has been approximately a year of planning and preparing. As of recently everything has been moving forward as planned; however, the RTO completion has been delayed, due to the postponed delivery of essential components from vendors, which are crucial to the RTO.

Completed Work Includes:

*Oven Installation: 2/5/24

*Concrete Pad Installation for Oxidizer: 2/7/24

Remaining Work to be Completed:

*Ducting Installation (Delayed): **From 1/5/24 to 4/8/24**

- Work is in progress, but cannot complete installation until the RTO is installed.

*RTO Scheduled Delivery (Delayed): **From 1/29/24 to 4/8/24**

- **Electrical Panels delayed from 1/19/24 to 4/5/24, due to delay in electrical components.**

- **Micro-Ratio Valve delayed from 11/3/23 to 3/8/24.** The Micro-Ratio Valve is a critical component that is essential for the Low NOx burner. This component is only produced by Honeywell (Maxon) for the Kinedizer LE, which is needed to meet SCAQMD's NOx limits in Rule 1147.

***Start of Production Date (Delayed): From 3/18/24 to 4/26/24.**

The Micro-Ratio Valve (MRV) is critical to the performance of the Low NOx Kinedizer LE burner, which is used to comply with Rule 1147. Honeywell (Maxon) is the only manufacturer that produces this component, which has a recently increased its lead times and delayed progressing orders. The electrical panels have not been completed, due to missing Allen Bradley electrical components. Once the parts arrive, the panel shop will still need time to install and complete the panels.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

As the project neared completion, SSE was expecting to receive the final components to deliver the RTO. The components were not received and were informed the components would be moved delivery would be moved back. SSE informed Innovative Baking Co. of the final delivery date on 2/8/24.

This unexpected and unplanned delay places Innovative Baking Co. in an severe position for loss in its production.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

Innovative Baking Co. and SSE have had constant communication since Thursday (2/8/24).
- SSE has looked into other in progress projects, but do not have any of the matching missing MRV component. The MRV size is not only specific to the burner size, but is also delayed on all other Kinedizer LE Burner orders that cannot expedite or guarantee their delivery. (2/8/24 & 2/9/24)
- The SSE's standard consists of using Siemens electrical components, unfortunately there are no spare parts to replace the missing Allen Bradley components. SSE has also looked into expediting the missing Allen Bradley electrical components, but the option is not available. The parts are set to arrive in March, which will need to be sent to the panel shop. When received, the panel shop can begin construction of the panels which typically takes a minimum of 4 weeks. (2/8/24 & 2/9/24)
- Explored the possibility of applying for a short variance. (2/9/24)
- Began short variance application. (2/12/24)

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: \$4,200,000 (estimated minimum)

Number of employees laid off (if any): 63 associates

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

There will be a high impact of product shortage to our customers with incalculable economic impact by not being able to fill their orders with products planned to be running on line 1. If the line is not able to start as planned, 3 crews of 21 associates each would need to be laid off. Rich's will be at risk of losing key customer accounts that might also impact on our production volumes on other lines, which might result in more layoffs, and a greater economic impact. We are currently running a buildup inventory to cover customer orders of product run on line 1. The plan is to come back to the new line 1 to start producing to customer's open purchase order that have been pushed out.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

No, we have customers waiting on orders that were pushed out but committed to be filled as soon as the line is back into production on March 18, 2024.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
Yeast	5	N/A	5

* Column A minus Column B = Column C

Excess Opacity: _____ %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

See attached table for calculations.

Equation used for Uncontrolled VOC Emissions:

Uncontrolled VOC emissions (lb/month) = [Tons of products/month] x [0.4042 + (0.4446)(y)(t)]

y = yeast concentration in the dough (%)

t = fermentation time (hr)

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

Without the RTO control equipment, it is not feasible to reduce emissions. Excess emissions will be collected and released to atmosphere through the use of the oven fans and ductwork system connected to the exhaust. Process fumes will be collected and exhausted through an emergency vent damper located on the roof. Trial runs will begin 3/18/2024 and will continue for 6 weeks until 4/29/2024, which will consist of minimal VOCs.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Recordkeeping of the yeast production will be monitored and collected through the Oven's SAP software. The data is gathered and reflected on a spreadsheet, which could be shared upon request.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

For a 6 week period from March 18th to April 29th, Innovative Baking Co. will be performing production trials (commissioning, qualifying and verification of operational parameters of the Oven, Proofer and surrounding conveyors). Full production will not begin until this trial period is complete.

The RTO will be installed and commissioned by 5/31/2024, and will be fully compliant with all rules and permit conditions. We are asking for this additional month to ensure that all parameters of the Oxidizer are in compliance with permit requirements

24. State the date you are requesting the variance to begin: 3/18/2024; and the date by which you expect to achieve final compliance: 5/31/2024.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

Clarisse Polintan	Ext. _____
_____	_____
Rosalinda Diaz	Ext. _____
_____	_____

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Eduardo Mendez	Ship & Shore Environmental	Project Manager
_____	_____	_____
Name	Company	Title

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on Feb 15-2004, at Towanda, California

<u>[Signature]</u>	<u>Javier Avila</u>
Signature	Print Name

Title: Plant Manager

26. SMALL BUSINESS and TABLE III SCHEDULE A FEES: To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

Declaration Re Reduced Fee Eligibility

1. The petitioner is
- a) an individual, or
 - b) an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is
- a) a business that meets the following definition of Small Business as set forth in District Rule 102:
SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:
 - (a) the number of employees is 10 or less; AND
 - (b) the total gross annual receipts are \$500,000 or less or
 - (iii) the facility is a not-for-profit training center.

-OR-

- b) an entity with total gross annual receipts of \$500,000 or less.

3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, at _____, California

Signature _____

Print Name _____

Title _____



South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

PERMIT TO CONSTRUCT/OPERATE

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Permit No.
G74241
A/N 644817

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

**Legal Owner
or Operator:**

INNOVATIVE BAKING CO
DBA: VENICE BAKING COMPANY
22417 S VERMONT AVE
TORRANCE, CA 90502

ID 175187

Equipment Location: 22417 S VERMONT AVE, TORRANCE, CA 90502

Equipment Description :

Baking Oven No. 1, BABBCO Air Impingement Tunnel Oven Model AH-104-80-3, Serial No. 21433-000-052322 10'-8" W. x 14'-6" L. x 6'-9" H., with Two (2) Burners, Maxon OvenPak, Model No. LE25, rated 2.5 MMBtu/hr, Natural Gas Fired, with Combustion Air Blower, 3 HP, and Maxon OvenPak, Model No. LE30, rated 3.15 MMBtu/hr, Natural Gas Fired, with a Combustion Air Blower, 3 HP.

Conditions :

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. This equipment shall be fired on natural gas only.
4. This equipment shall not be operated unless vented to an air pollution control equipment which is in full use and which has been issued a valid permit by the South Coast AQMD.
5. This equipment shall emit no more than 30 ppm of oxides of nitrogen (NO_x), calculated as NO₂ measured by volume on a dry basis at 3% O₂.
6. This equipment shall emit no more than 800 ppm oxides of carbon monoxide (CO), measured by volume on a dry basis at 3% O₂.
7. This equipment shall comply with all applicable requirements of Rule 1153.1
8. This equipment shall display and maintain the model number and Rated Heat Input Capacity of the Unit burner(s) on a permanent rating plate.
9. The operator of this equipment shall perform Combustion System maintenance in accordance with the manufacturer's schedule and specifications as identified in the manual or other written materials supplied by the manufacturer or distributor.

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10. The controlled VOC emissions from fermentation and baking from from Oven Nos. 1, 2 and 3 shall not exceed 570 pounds in any calendar month:
- A. The controlled VOC emission (from fermentation and baking) limit in this condition shall be calculated as follows:
Controlled VOC emission = [Uncontrolled VOC emissions] x [1-0.95]
 - B. Then uncontrolled VOC emissions from fermentation and baking in Oven Nos. 1, 2 and 3 shall include VOC emissions from baking yeast containing dough and any other VOCs added to the dough (if there is any).
 - C. The uncontrolled VOC emission from baking yeast containing dough shall be calculated as follows:
Uncontrolled VOC emissions (lb/month) = [Tons of products/month] x [0.4042 + (0.4446)(y)(t)]
Where:
y = yeast concentration in the dough (%)
t = fermentation time (hr)
11. A source test protocol shall be submitted to the South Coast AQMD (addressed to the South Coast AQMD, Attn: Clarisse Polintan, Engineering & Permitting, 21865 Copley Drive, Diamond Bar, CA 91765) no later than 30 days from the date this permit is issued, unless otherwise approved in writing by the South Coast AQMD. The test protocol shall be approved in writing by the South Coast AQMD before the test commences. The test protocol shall include the completed South Coast AQMD Forms ST-1 and ST-2 specifying the proposed operating conditions of the equipment during the test, identity of the testing laboratory, a statement from the testing laboratory certifying it meets the criteria in South Coast AQMD Rule 304(k), and a description of the sampling and analytical procedures to be used.
12. The owner or operator of this equipment shall conduct an initial source test and subsequent source test every five years to verify compliance with the emission limits specified in Condition 5, Condition 6 and Rule 1153.1. The source test for NOx and CO shall be conducted within 90 days after the approval of the source test protocol.
13. The source test shall consist of, but may not be limited to, a test of the outlet of the oven for:
- A. NOx emission, in lb/hr and ppmv
 - B. CO emission, in lb/hr and ppmv
 - C. Oxygen content
 - D. Moisture content
 - E. Flow rate
 - F. Temperature
14. Source test notification shall be submitted in writing to the South Coast AQMD at least 14 days prior to testing so that an observer may be present.

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15. Two complete copies of the source test reports shall be submitted to the South Coast AQMD (addressed to the South Coast AQMD, Attn: Clarisse Polintan, Engineering & Permitting, 21865 Copley Drive, Diamond Bar, CA 91765) within 30 days after the source testing date, unless otherwise approved in writing by the Executive Officer. The source test report shall include, but not be limited to, all testing data required by this permit.
16. A testing laboratory certified by the California air resources board in the required test methods for criteria pollutants to be measured, and in compliance with South Coast AQMD Rule 304 (no conflict of interest) shall conduct the test. 14. Sampling facilities shall comply with the South Coast AQMD guidelines.
17. Sampling facilities shall comply with the South Coast AQMD guidelines for construction of sampling and testing facilities pursuant to Rule 217.
18. Records shall be maintained to demonstrate compliance with the Conditions on this permit. Records shall be kept in a format acceptable to the South Coast AQMD, shall be retained at the facility for a minimum of five years, and shall be made available to South Coast AQMD personnel upon request.

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A/N 644817

NOTICE

In accordance with Rule 206, this Permit to Operate or copy shall be posted on or within 8 meters of the equipment.

This permit does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the applicable Rules and Regulations of the South Coast Air Quality Management District (SCAQMD). This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other government agencies.

Executive Officer

A handwritten signature in black ink, appearing to read "Aspell".

BY JASON ASPELL/CP06

12/2/2023

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South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
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Permit No.
G74245
A/N 644821

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301(d)) is not received by the expiration date, contact the District.

**Legal Owner
or Operator:**

INNOVATIVE BAKING CO
DBA: VENICE BAKING COMPANY
22417 S VERMONT AVE
TORRANCE, CA 90502

ID 175187

Equipment Location: 22417 S VERMONT AVE, TORRANCE, CA 90502

Equipment Description :

Air Pollution Control System consisting of:

1. Regenerative Thermal Oxidizer No. 2, Ship & Shore Environmental, Inc., with Two Chambered Ceramic Heat Exchange and a Low NOx Burner, Maxon, Rated at 2.4 MMBtu/hr, Natural Gas Fired, with a 7.5 HP Combustion Air Blower.
2. Exhaust System with a 100 HP Exhaust Blower venting One Bakery Oven (No. 1).

Conditions :

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. This equipment shall be fired on natural gas only.
4. This equipment shall be in full operation whenever the equipment it is serving is in operation.
5. The oxides of nitrogen (NOx) emissions discharged from the start up burner of the RTO system shall not exceed 20 ppmv, calculated as NO2 and measured by volume on a dry basis at 3% O2, and averaged over 30 consecutive minutes.
6. This equipment shall emit no more than 1,000 ppm oxides of carbon monoxide (CO), measured by volume on a dry basis at 3% O2.
7. This system shall be maintained and operated at a minimum VOC destruction efficiency of 95% and overall VOC control efficiency (collection and destruction) of 95% when the basic equipment it serves is in operation.

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8. A temperature indicating and recording system shall be installed and maintained to continuously measure and record the temperature in the combustion chamber of the oxidizer. Such a system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected, maintained and calibrated on an annual basis in accordance with the manufacturer's specifications. The temperature indicating and recording system shall be in operation whenever the equipment it serves is in operation.
9. A temperature of not less than 1500 degrees Fahrenheit shall be maintained in the oxidizer combustion chamber when the equipment it serves is in operation.
10. This equipment shall comply with all applicable requirements of Rule 1147.
11. This equipment shall display and maintain the model number and Rated Heat Input Capacity of the Unit burner(s) on a permanent rating plate.
12. The operator of this equipment shall perform Combustion System maintenance in accordance with the manufacturer's schedule and specifications as identified in the manual or other written materials supplied by the manufacturer or distributor.
13. A source test protocol shall be submitted to the South Coast AQMD (addressed to the South Coast AQMD, Attn: Clarisse Polintan, Engineering & Permitting, 21865 Copley Drive, Diamond Bar, CA 91765) no later than 30 days from the date this permit is issued, unless otherwise approved in writing by the South Coast AQMD. The test protocol shall be approved in writing by the South Coast AQMD before the test commences. The test protocol shall include the completed South Coast AQMD Forms ST-1 and ST-2 specifying the proposed operating conditions of the equipment during the test, identity of the testing laboratory, a statement from the testing laboratory certifying it meets the criteria in South Coast AQMD Rule 304(k), and a description of the sampling and analytical procedures to be used.
14. The owner or operator of this equipment shall conduct an initial source test and subsequent source test every five years to verify compliance with Rule 1147, Conditions No. 5, and Condition No. 6 of this permit.
15. The source test shall consist of, but may not be limited to, a test of the inlet and the outlet of the thermal oxidizer when the oven is in operation and processing at maximum process rate for:
 - A. NOx emission, in lb/hr and ppmv
 - B. CO emission, in lb/hr and ppmv
 - C. Volatile Organic compound (VOC), in lb/hr and ppmv
 - D. VOC overall control efficiency
 - E. Oxygen content
 - F. Moisture content
 - G. Flow rate
 - H. Temperature
16. Source test notification shall be submitted in writing to the South Coast AQMD at least 14 days prior to testing so that an observer may be present.

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17. Two complete copies of the source test reports shall be submitted to the South Coast AQMD (addressed to the South Coast AQMD, Attn: Clarisse Polintan, Engineering & Permitting, 21865 Copley Drive, Diamond Bar, CA 91765) within 30 days after the source testing date, unless otherwise approved in writing by the Executive Officer. The source test report shall include, but not be limited to, all testing data required by this permit.
18. A testing laboratory certified by the California air resources board in the required test methods for criteria pollutants to be measured, and in compliance with South Coast AQMD Rule 304 (no conflict of interest) shall conduct the test. 14. Sampling facilities shall comply with the South Coast AQMD guidelines.
19. Sampling facilities shall comply with the South Coast AQMD guidelines for construction of sampling and testing facilities pursuant to Rule 217.
20. Records shall be maintained to demonstrate compliance with the Conditions on this permit. Records shall be kept in a format acceptable to the South Coast AQMD, shall be retained at the facility for a minimum of five years, and shall be made available to South Coast AQMD personnel upon request.
21. This permit shall expire if construction of this equipment is not complete within one year from the issuance date of this Permit unless an extension is approved in writing by the Executive Officer. A written request for extension shall be filed with the South Coast AQMD Engineering Division prior to the permit expiration date. The written request shall include reasons for extension request, status of construction, estimate completion date and increments of progress.

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NOTICE

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Executive Officer

A handwritten signature in black ink, appearing to read "Aspell".

BY JASON ASPELL/CP06

12/2/2023

ORIGINAL

Wirth Gas Equipment, Inc.

1233 W. Glenoaks Blvd. | Glendale, CA 91201
Tel: 323.245.9523 | Email: sales@wirthgasequipment.com

Eduardo Mendez
Ship and Shore Environment Inc.
2474 N Palm Drive
Signal Hill, CA 90755

Dear Mr. Mendez,

In regards to the delay in delivery for the Maxon Micro Ration Valve (MRV); the process has become a multiple stage endeavor. Since the Eclipse Maxon merger and the consolidation of Eclipse into the Maxon manufacturing facility many of the processes are now done out of house. Essentially, the MRV is initially created at an external casting house, it is then shipped into Maxon for quality control. Then it is shipped out to a machining facility. Once the machining is done the valve is then sent back to Maxon. Once again sent to quality control. Afterwards the internal mechanisms either P or M style is then installed at Maxon. Once completed the mounting bracket for the mod motor is assembled then sent to shipping. To throw more fuel on the fire the MRV is essentially 2 valves put together (1 air, 1 gas) both valves are delt with separately in Maxon as they have multiple uses for other assemblies.

Sincerely,



Colin Neil
President
Wirth Gas Equipment Inc.

Material	ProdLine	Cs Planned	Dough Group	DoughLbsRequired	Yeast Required (Lb)	Tons	Yeast %	Time hr	Uncontrolled	Controlled EF	Controlled Pounds of VOC/Month	Uncontrolled
11819	PLIN1	30,000	706277	216,000	2,243	108.00	1.038%	0.33	43.82	95%	2.19	41.63
19870	PLIN1	1,185	704542	29,033	295	14.52	1.016%	0.33	5.89	95%	0.29	5.59
19872	PLIN1	274	704543	4,932	98	2.47	1.981%	0.33	1.00	95%	0.05	0.95
19873	PLIN1	704	704543	7,040	139	3.52	1.981%	0.33	1.43	95%	0.07	1.36
19876	PLIN1	2,450	704544	13,475	260	6.74	1.929%	0.33	2.74	95%	0.14	2.61
19878	PLIN1	5,805	704544	58,776	1,116	29.39	1.899%	0.33	11.96	95%	0.60	11.36
19879	PLIN1	1,832	704544	13,099	249	6.55	1.899%	0.33	2.67	95%	0.13	2.53
19891	PLIN1	4,851	704547	49,723	695	24.86	1.399%	0.33	10.10	95%	0.50	9.59
19902	PLIN1	7,174	704554	50,218	446	25.11	0.888%	0.33	10.18	95%	0.51	9.67
19903	PLIN1	655	704554	4,585	41	2.29	0.883%	0.33	0.93	95%	0.05	0.88
19904	PLIN1	1,015	704554	7,105	63	3.55	0.887%	0.33	1.44	95%	0.07	1.37
19908	PLIN1	1,621	704556	11,671	109	5.84	0.930%	0.33	2.37	95%	0.12	2.25
19914	PLIN1	6,376	704557	65,354	521	32.68	0.796%	0.33	13.25	95%	0.66	12.58
19915	PLIN1	852	704557	8,520	68	4.26	0.792%	0.33	1.73	95%	0.09	1.64
19920	PLIN1	2,100	704558	21,350	257	10.68	1.202%	0.33	4.33	95%	0.22	4.12
19922	PLIN1	3,683	704557	43,889	350	21.94	0.796%	0.33	8.90	95%	0.44	8.45
19923	PLIN1	1,233	704558	14,385	173	7.19	1.200%	0.33	2.92	95%	0.15	2.77
23391	PLIN1	1,385	704554	9,695	86	4.85	0.887%	0.33	1.97	95%	0.10	1.87
23392	PLIN1	1,079	704556	7,769	72	3.88	0.927%	0.33	1.58	95%	0.08	1.50
		74,274		636,615	7,278	318.31	1.14%		129.19		6.46	123